



Housing Authority of the
County of San Bernardino
Building Opportunities Together

2024
Report

MOVING to WORK

Board of Commissioners



Housing Authority of the
County of San Bernardino
Building Opportunities Together



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NOTE: TWO SEATS ARE CURRENTLY VACANT ON THE HACSB BOARD OF COMMISSIONERS.

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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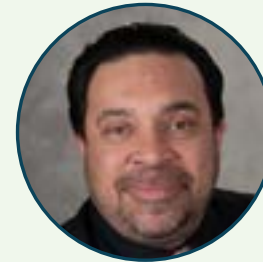
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HACSB offers language assistance free of charge. For assistance with this document, please contact our office at 909.890.0644.

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I. Introduction

Who We Are

Our core work is to provide rental assistance to prevent homelessness among low-income households. As the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 27,500 people, most of whom are seniors, individuals with disabilities, veterans, and children. Since 1941, we have helped low-income families attain safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). In FYE 2024, more than 11,500 families were served through housing assistance payments made to landlords on behalf of the families or resided in units owned and managed by HACSB. Our largest program, the Housing Choice Voucher program, is America's largest homelessness prevention program. The affordable rental housing programs we administer provide a critical safety net for households in San Bernardino County, where it takes twice the minimum wage to afford median rent for a two-bedroom apartment. We understand that housing a family is the first step on their path to self-sufficiency.

Achieving safe and stable housing is only one step on the path toward self-sufficiency. To support our customers' needs beyond housing, HACSB built and leverages community partnerships that provide supportive services and opportunities. These services create a meaningful difference in the lives of families we serve.

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.

The Moving to Work Designation

Moving to Work (MTW) is a national demonstration program for housing authorities created by Congress in 1996. 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

138 agencies, roughly 4% of housing authorities across the country, are designated as MTW agencies. The lessons learned by MTW agencies influences national housing policy to improve housing programs and services for all families.

HACSB was designated by Congress in 2008 as a MTW agency, allowing HACSB to waive some HUD program requirements to develop policies targeting at least one of the three Statutory Objectives of the MTW program. The MTW designation does not provide any additional funding. However, it has allowed us to modify some administrative processes to attain modest staff time and cost savings that have helped us weather ongoing funding cuts. Since receiving the MTW designation, HACSB has developed and received approval for 30 MTW activities. More information about our MTW activities is provided throughout this Report.

Contents of This Report

This Annual Moving to Work Report 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 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* includes no new information as no MTW activities are proposed through the MTW Report format.
- *Section IV: Approved MTW Activities* provides information about previously approved uses of MTW authority. This section also includes information about closed out activities, including the closing of Activity #30 – Valencia Grove Phase II, Affordable Rent Strategy through this annual MTW Report.
- *Section V: Sources and Uses of MTW Funds* describes the agency's use of the MTW single-fund flexibility and includes information about HACSB's local asset management program.
- *Section VI: Administrative* provides information about reviews and audits of the agency, third-party evaluation of HACSB's MTW activities, and other required information.

Long-Term Goals

HACSB’s long-term goals are outlined in our agency-wide Strategic Plan. The primary goals of the Strategic Plan are described through five Aspirational Statements. The Aspirational Statements were developed based on feedback derived from our team, Board of Commissioners, partners, and program participants/residents. Aspirational Statements reflect who we aspire to be, the strategic direction of the agency, and align with the statutory objectives of the MTW designation and guide our work. The flexibilities provided through our MTW designation will continue to support our efforts to achieve our long-term goals.

HACSB’s Aspirational Statements are:

<p>Aspirational Statement #1</p> <p>To ensure that 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.</p>	<p>Aspirational Statement #2</p> <p>To be known as a trusted provider of safe, dignified, and desirable homes and environments that enrich and add value to the community.</p>	<p>Aspirational Statement #3</p> <p>To pursue continued financial stability, monitoring, and accountability as stewards of limited funding.</p>	<p>Aspirational Statement #4</p> <p>To utilize research and technology to drive innovative programming and operational processes that allow us to be more responsive and result in the advancement of the families we serve.</p>	<p>Aspirational Statement #5</p> <p>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.</p>
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Short-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 nine MTW activities that address this goal.

II. General Operating Information

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

A. Housing Stock Information

i. Actual New Project-Based Vouchers

PROPERTY NAME	NUMBER OF VOUCHERS NEWLY PROJECT-BASED		STATUS AT END OF PLAN YEAR	RAD?	DESCRIPTION OF PROJECT
	PLANNED	ACTUAL			
Northport Village	0	29	Leased/Issued	No	Supportive Housing Units
TOTAL	0	29			

ii. Actual Existing Project-Based Vouchers

See Appendix for list of current project-based vouchers.

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

Valencia Grove – Redevelopment of this former Public Housing site in Redlands is ongoing. Construction of Phase II is underway and currently has an estimated completion date of June 2025. This phase includes 104 new affordable rental units. HACSB is in the process of selecting a developer partner for Phase III. This final phase of redevelopment will construct 39 new single-family homes to be made available for purchase by low-income households. Groundbreaking for Phase III may take place in CY 2025.

Northport Apartments – This multi-family market-rate property located in Victorville was acquired by HACSB in November 2023. HACSB purchased the 60-unit community and placed 29 project-based vouchers at the site to ensure long-term affordability for residents and bring more affordable housing choice to the High Desert region of our county.

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

Physical rehabilitation work continued at some of our Rental Assistance Demonstration (RAD) PBV communities. Work was completed at our Los Olivos RAD site in Upland including ADA unit conversions, window replacements, and electrical upgrades. Also, our Barstow RAD sites received improvements including window replacements, furnace upgrades, community room improvements, door replacements, and new fencing. Some physical rehabilitation work also took place at newly acquired Northport Apartments.

B. Leasing Information

i. Actual Number of Households Served

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

ACTUAL NUMBER OF HOUSEHOLDS SERVED THROUGH:	NUMBER OF UNIT MONTHS OCCUPIED/LEASED		NUMBER OF HOUSEHOLDS SERVED	
	PLANNED	ACTUAL	PLANNED	ACTUAL
MTW Public Housing Units Leased	12	12	1	1
MTW Housing Choice Vouchers (HCV) Utilized	118,560	122,292	9,880	10,191
Local, Non-Traditional: Tenant-Based	0	0	0	0
Local, Non-Traditional: Property-Based	0	0	0	0
Local, Non-Traditional: Homeownership	0	0	0	0
ACTUAL TOTAL HOUSEHOLDS SERVED	118,572	122,304	9,881	10,192

Description of Differences between the Planned and Actual Households Served

Leasing projections for the MTW Public Housing Program for FY 2024 were based upon the one remaining Public Housing unit in HACSB's portfolio. The reported number of households served reflects one household served through Public Housing in FY 2024.

For the voucher program, the reported number of unit months occupied/leased reflects the number of unit months reported through the Voucher Management System (VMS), while the reported number of households served reflects all households served in FY 2024, including those who were served for only a portion of the year.

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

HOUSEHOLDS RECEIVING LOCAL, NON-TRADITIONAL SERVICES ONLY	AVERAGE NUMBER OF HOUSEHOLDS PER MONTH	TOTAL NUMBER OF HOUSEHOLDS IN THE PLAN YEAR
N/A	N/A	N/A

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

HOUSING PROGRAM	DESCRIPTION OF ACTUAL LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None.
MTW Housing Choice Voucher	The HCV program ended fiscal year (FY) 2024 with a 97.6% leasing rate but a 107.2% funding utilization rate. Housing Assistance Payment (HAP) expenses are significantly outpacing funding. HACSB has taken steps to reduce HAP expenses and prevent further HAP expense increases, such as not selecting new households from our tenant-based voucher program wait list since summer 2023. Additional measures leveraging MTW flexibilities will be implemented in FY 2025 to help prevent a funding shortfall.
Local, Non-Traditional	N/A.

C. Waiting List Information

i. Actual Waiting List Information

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED	WAS THE WAITING LIST OPENED DURING THE PLAN YEAR
Public Housing	Centrally managed, site-specific, by bedroom size	0	Closed	No, all but 1 unit converted to RAD PBV
Rental Assistance Demonstration Sites – PBV	Centrally managed, site-specific, by bedroom size	51,587	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher – Project-Based	Centrally managed, site/region-specific, by bedroom size	35,711	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher – Tenant-Based	Community-wide	25,463	Closed	No

DESCRIPTION OF DUPLICATION OF APPLICANTS ACROSS WAITING LISTS

42% of applications are duplicates, representing families who have applied to two or more waiting lists. There are 65,510 unduplicated families on HACSB's waiting lists.

ii. Actual Changes to Waiting List in the Plan Year

WAITING LIST NAME	DESCRIPTION OF ACTUAL CHANGES TO WAITING LIST
Rental Assistance Demonstration Sites – PBV	Site-based waiting lists are opened as needed to fill vacancies.
Housing Choice Voucher – Tenant-Based	The waiting list remained closed throughout the FY.

D. Information on Statutory Objectives and Requirements

i. 75 Percent of Families Assisted are Very Low-Income

INCOME LEVEL	NUMBER OF LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED IN THE PLAN YEAR
80% - 50% Area Median Income	0
49% - 30% Area Median Income	0
Below 30% Area Median Income	0
TOTAL LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED	0

ii. Maintain Comparable Mix

BASELINE MIX OF FAMILY SIZES SERVED (UPON ENTRY TO MTW)					
FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	442	2,801	-	3,243	34.7%
2 Person	338	1,619	-	1,957	20.9%
3 Person	279	1,187	-	1,466	15.7%
4 Person	222	1,003	-	1,225	13.1%
5 Person	142	567	-	709	7.6%
6+ Person	183	569	-	752	8.0%
TOTAL	1,606	7,746	-	9,352	100%

DESCRIPTION OF "NON-MTW ADJUSTMENTS" GIVEN ABOVE
N/A

MIX OF FAMILY SIZES SERVED (IN PLAN YEAR)				
FAMILY SIZE	BASELINE MIX PERCENTAGE	NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR	PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR	PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR
1 Person	34.7%	4,082	40.1%	15.4%
2 Person	20.9%	2,052	20.1%	-3.7%
3 Person	15.7%	1,623	15.9%	1.4%
4 Person	13.1%	1,046	10.3%	-21.6%
5 Person	7.6%	765	7.5%	-1.2%
6+ Person	8.0%	623	6.1%	-23.6%
TOTAL	100%	10,191	100%	

DESCRIPTION OF JUSTIFICATION FOR ANY VARIANCES OF MORE THAN 5% BETWEEN THE PLAN YEAR AND BASELINE YEAR

Families are admitted to HACSB's MTW voucher program from a wait list which is sorted through a lottery system. The families served during the year reflect the families who were selected from the wait list and, in the voucher program, successfully located a unit to lease. HACSB closely monitors the makeup of its waiting list, admissions, and families served by family size. The distribution of families by size in the populations remained very similar throughout FY 2024, indicating that the families served are representative of families who apply to HACSB's waiting lists and successfully enter a HACSB program.

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

HACSB has adopted the definitions of self-sufficiency listed below for the activities that have the statutory objective of self-sufficiency and/or for which we are required to report on Standard Metric SS #8 (Households Transitioned to Self-Sufficiency). While the definitions differ, the overarching definition for the families in these activities is a voluntary termination of housing assistance and other forms of government assistance due to an increase in income, education, savings, and/or employment to enable transition to market-rate housing or homeownership. The criteria generally used to identify these individuals is:

- Voluntary termination of housing assistance;
- Total household income of 80% of AMI or greater at time of termination;

- Total household income from other forms of government assistance (TANF, cash aid, etc.) of \$0 at time of termination.

In 2024, a total of 221 families transitioned to self-sufficiency through our activities. While some MTW activities contribute to the families' transition away from housing assistance more than others, we believe that the number of self-sufficiency transitions is the combined result of all our MTW activities.

MTW ACTIVITY NAME/NUMBER	NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF- SUFFICIENCY	MTW PHA LOCAL DEFINITION OF SELF-SUFFICIENCY
4 – Biennial and Triennial Recertifications	33	Having a total gross household income at or above 80% of the Area Median Income for the family size at the time of end of participation.
10 – Minimum Rent	1	Having a total gross household income at or above 80% of the Area Median Income for the family size at the time of end of participation.
20 – Term-Limited Lease Assistance Program	187	Termination of housing assistance and other forms of government assistance due to an increase in income and/or increased level of employment to transition to market-rate housing or homeownership in the five-year program timeframe.
22 – Streamlined Lease Assistance Program	133	Having a total gross household income at or above 80% of the Area Median Income for the family size at the time of end of participation.
23 – No Child Left Unsheltered	0	Having a total gross household income at or above 80% of the Area Median Income for the family size at the time of end of participation.
24 – Transition for Over-Income Families	26	Having a total gross household income at or above 80% of the Area Median Income for the family size at the time of end of participation.
HOUSEHOLDS DUPLICATED ACROSS MTW ACTIVITIES	64	
TOTAL (UNDUPLICATED) HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY	221	

The Biennial and Triennial Recertification Activity (No. 4) is not expected to directly result in any transitions to self-sufficiency. The goal of the activity is administrative efficiency, and HACSB believes it is unlikely that the activity will provide enough incentive or income retention to enable households to transition out of housing assistance. In FY 2024, 33 households with biennial or triennial recertifications transitioned to self-sufficiency. However,

only nine of the 33 families were not duplicated as self-sufficiency exits in other categories listed above, indicating that most exits were likely the result of other activities.

Activity 10, HACSB's Local Minimum Rent activity, resulted in one household that transitioned to self-sufficiency. Through this activity the minimum rent was raised from the current regulatory maximum of \$50 to \$125. HACSB believes that this change is not enough to provide incentive for families to transition out of housing assistance.

Implemented on January 1, 2012, Activity 20, the Term-Limited Lease Assistance Program included 1,971 households as of September 30, 2024, of which 187 transitioned to self-sufficiency in this reporting year. HACSB continues to work with Loma Linda University (LLU) to conduct the longitudinal study that examines participating households and their success over time, including a voluntary post-assistance evaluation component which allows LLU and HACSB to learn about program impacts up to two years after housing assistance has ended.

Activity 22 – The Streamlined Lease Assistance Program was implemented on February 1, 2015. This activity simplifies the rent calculation and eliminates interim recertifications for changes in income, thereby allowing the family to budget for rent and keep the entire amount of any increases to household income which occur between biennial recertifications.

No Child Left Unsheltered (Activity 23) has not resulted in any transitions to self-sufficiency. 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 provides housing assistance through the Housing Choice Voucher program coupled with supportive services. HACSB also partnered with Loma Linda University (LLU) for a longitudinal study of families participating in this program. The LLU research previously identified families' need for a safe-haven period after entering the NCLU program and found that two significant impacts of the program are improved family stability and reduced risk of developing a clinically significant behavioral program for children participating in the program. As a result of these findings, related modifications were made to this activity through HACSB's 2019 Annual MTW Plan.

III. Proposed Activities

All activities that have been previously granted approval by HUD are reported in Section IV, “Approved Activities”. No new activities are proposed through this Annual MTW Report.

IV. Approved Activities

This section provides HUD-required information detailing previously approved uses of MTW authority, including detailed information about ongoing MTW activities with an update on any changes taking place during the fiscal year (FY). In accordance with the requirements of the revised Form HUD 50900, activities are categorized as implemented (ongoing and active activities), not yet implemented, on hold, or closed out.

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/Impact/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, VASH, and EHV households biennially or triennially. Elderly-only fixed-income households are recertified triennially; all other households are recertified biennially. Triennial recertifications for elderly-only fixed-income households began in September of 2019, with triennial recertifications for VASH participants 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 households, 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 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 writing. 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 normal operations have resumed. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

Activity 4: Biennial Recertifications
CE #1: Agency Cost Savings¹

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total Cost of Annual Recertifications (Public Housing and Housing Choice Voucher Combined).	\$462,964 \$445,954 staff cost + \$17,010 postage cost Staff Cost Calculation: 13,320 hours X \$33.48	\$231,482 per year \$222,977 staff cost + \$8,505 postage cost Staff Cost Calculation: 6,660 hours X \$33.48 per hour	\$137,702 \$128,731 staff cost + \$8,971 postage cost Staff Cost Calculation: 3,845 hours X \$33.48 per hour	Yes, the outcome meets the benchmark for this metric.

¹ The baseline and benchmark values for this metric were revised in HACSB's FY 2017 Annual MTW Report using a comparison group of non-MTW recertifications to re-determine the time required to process recertifications.

Activity 4: Biennial Recertifications
CE #2: Staff Time Savings²

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total staff hours to conduct recertifications.	13,320 total hours 9,000 files x 1.48 hours/file.	6,660 total hours	3,845 total hours. Staff Time Calculation: 3,286 recertifications performed in PH and HCV programs x 1.17 hours per recertification.	Yes, the outcome meets the benchmark for this metric.

² The baseline and benchmark values for this metric were revised in HACSB's FY 2017 Annual MTW Report using a comparison group of non-MTW recertifications to re-determine the time required to process recertifications.

Activity 4: Biennial Recertifications
CE #5: Increase in Tenant Rent Share

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average tenant rent share in dollars.	Average tenant rent share for biennial recertification households in FY 2011 prior to full implementation of the activity is \$281.	The average tenant rent share is not expected to change because of this activity.	The actual average tenant rent share is \$570.	The increase is believed to be the result of other MTW activities.

Activity 4: Biennial Recertifications
SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation.	Whether the outcome meets or exceeds the benchmark.
Average earned income of households.	Average earned income of biennial recertification households in FY 2011 prior to full implementation of the activity is \$4,734.	The expected average earned income of households is not expected to change because of this activity.	The actual average earned income of biennial and triennial recertification households is \$9,173.	The increase is believed to be the result of other MTW activities.

Activity 4: Biennial Recertifications
SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline ³	Benchmark	Outcome ⁴	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
(1) Employed Full-Time	Head(s) of work-able households employed full-time in FY 2016 is 175.	The number of heads of work-able households employed full-time is not expected to change as a result of this activity.	Heads of work-able households employed full-time is 1,110.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities and/or additional data available in the outcome year compared to the baseline year.
	Percentage of total work-able households employed full-time in FY 2016 is 38%.	The percentage of total work-able households employed full-time is not expected to change as a result of this activity.	Percentage of total work-able households employed full-time is 30%	No, the outcome does not meet the benchmark.

³ Pre-implementation data for categories 1, 2, 3, 4, and 6 of this metric is unavailable. Baseline figures represent FY 2016 data. Baseline data from 2016 reflects 10% of all work-able biennial reexamination families.

⁴ Outcomes for SS #3 are based upon self-reported data collected from families and may not include all active families.

Activity 4: Biennial Recertifications – SS #3: Increase in Positive Outcomes in Employment Status (continued)

(2) Employed Part-Time	Head(s) of work-able households employed part-time in FY 2016 is 86.	The number of heads of work-able households employed part-time is not expected to change as a result of this activity.	Heads of work-able households employed part-time is 529.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities and/or additional data available in the outcome year compared to the baseline year.
	Percentage of total work-able households employed part-time in FY 2016 is 19%.	The percentage of total work-able households employed part-time is not expected to change as a result of this activity.	The percentage of total work-able households employed part-time is 14%.	No, the outcome does not meet the benchmark.
(3) Enrolled in an Educational Program	Head(s) of work-able households enrolled in an educational program in FY 2016 is 39.	The number of heads of work-able households enrolled in an educational program is not expected to change as a result of this activity.	Heads of work-able households enrolled in an educational program is 284.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities and/or additional data available in the outcome year compared to the baseline year.
	Percentage of total work-able households enrolled in an educational program in FY 2016 is 8%.	The percentage of total work-able households enrolled in an educational program is not expected to change as a result of this activity.	The percentage of total work-able households enrolled in an educational program is 8%.	Yes, the outcome meets the benchmark for this metric.

Activity 4: Biennial Recertifications – SS #3: Increase in Positive Outcomes in Employment Status (continued)

(4) Enrolled in Job Training Program	Head(s) of work-able households enrolled in a job training program in FY 2016 is 9.	The number of heads of work-able households enrolled in a job-training program is not expected to change as a result of this activity.	Heads of work-able households enrolled in job training is 125.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities and/or additional data available in the outcome year compared to the baseline year.
	Percentage of total work-able households enrolled in a job training program in FY 2016 is 2%.	The percentage of total work-able households enrolled in a job-training program is not expected to change because of this activity.	The percentage of total work-able households enrolled in job training is 3%.	
(5) Unemployed	Head(s) of work-able households unemployed prior to implementation of the activity is 200.	The number of heads of household unemployed after implementation of the activity is not expected to change because of this activity.	Heads of work-able households unemployed is 2,059.	No, the outcome does not meet the benchmark for this metric.
	Percentage of total work-able households unemployed prior to implementation of the activity is 43%.	The percentage of total work-able households unemployed after implementation of the activity is not expected to change as a result of this activity.	Percentage of total work-able households unemployed is 56%.	

Activity 4: Biennial Recertifications – SS #3: Increase in Positive Outcomes in Employment Status (continued)

6) Other	Head(s) of work-able households engaged in other activities in FY 2016 is 22.	The number of heads of household engaged in other activities is not expected to change as a result of this activity.	Heads of work-able households engaged in other activities is 428.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities and/or additional data available in the outcome year compared to the baseline year.
	Percentage of total work-able households engaged in other activities in FY 2016 is 5%.	The percentage of total work-able households engaged in other activities is not expected to change as a result of this activity.	The percentage of total work-able households engaged in other activities is 12%.	

Activity 4: Biennial Recertifications SS# 4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households receiving TANF assistance (decrease).</i>	<i>Households receiving TANF prior to implementation of the activity (number)</i>	<i>Expected number of households receiving TANF after implementation of the activity (number).</i>	<i>Actual households receiving TANF after implementation of the activity (number).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
Number of households receiving TANF assistance.	Number of households receiving TANF in FY 2011 prior to full implementation of the activity is 29.8% of all MTW households.	The number of households receiving TANF after implementation of the activity is not expected to change because of this activity.	Actual households receiving TANF is 2,501 (25%).	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities.

Activity 4: Biennial Recertifications
SS #8: Households Transitioned to Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for “self-sufficiency” to use for this metric. Each time the PHA uses this metric, the “Outcome” number should also be provided in Section (II) Operating Information in the space provided.</i>	<i>Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.</i>	<i>Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
<p><i>Number of households transitioned to self-sufficiency.</i></p> <p><i>For purposes of this activity, “self-sufficiency” is defined as having a total gross household income at or above 80% of the Area Median Income for the family size (at the time of end of participation).</i></p>	<p>The number of households transitioned to self-sufficiency prior to implementation of the activity is 57.</p> <p>(FY 2015 data used to establish baseline as pre-implementation data is unavailable)</p>	The number of households expected to be transitioned to self-sufficiency because of the activity is 0.	The number of households transitioned to self-sufficiency in FY 2024 is 33.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

Standard metrics CE #5, SS #1, 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. 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.

Pre-implementation baseline data for standard metric SS #8 is unavailable. In accordance with written instruction from HUD, data from FY 2015 was used to establish the baseline for this metric.

Beginning in FY 2019 HACSB applied a revised time study method. The previous study method was retrospective and required staff to report on time previously spent. This process was changed to a real-time method which tracked the time staff spent on a randomly selected representative sample of files. Staff recorded time spent on the recertification process as they worked on the files, including time spent in specific categories relevant to MTW reporting and internal analysis. This process is believed to provide a more reliable and accurate evaluation of time spent on recertifications and other processes, and HACSB anticipates using this method for all future time studies. In years without significant changes in the MTW activity and/or related processes, HACSB will use average data from previous years' time study evaluations. A full time study will be performed periodically to ensure that reported data continues to reflect actual processing time.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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: Originally approved in our FY 2009 Initial Annual MTW Plan and effective on 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 Annual MTW Plan for informational purposes. All components of this activity except the elimination of the Earned Income Disallowance apply to EHV households.

ii. Description/Impact/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. The activity applies to all MTW families. All components of the activity except the elimination of the Earned Income Disallowance component also apply to VASH and EHV households. For all MTW households, HACSB uses anticipated income (based on current information) to calculate the family’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 income determine process for our customers and staff, reducing staff time spent on verifications, calculation of assets, processing the Earned Income Disallowance. Agency costs related to these processes have also been reduced.

Local 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 for 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 or EHV 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 family'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.

Activity 5: Simplified Income Determination
CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total combined costs: <ul style="list-style-type: none"> • of income verification process • to collect and calculate asset income for both PH and HCV • of staff time spent to process EID 	\$296,512 in 2009	\$160,117 Agency Cost Calculation: 4,580 hours for verifications X \$34.96 staff cost per hour. \$0 for calculation of assets or application of the EID	\$74,395 Staff Cost Calculation: 2,128 hours X \$34.96 staff cost per hour.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 5: Simplified Income Determination
CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total hours to conduct verifications	8,483.4 total hours 6,947 hours for verifications (1,133 hours in Public Housing; 5,814 in HCV) 1,478 hours to calculate assets. 58.4 hours to process the EID	4,580 total hours Staff Time Calculation: 705 hours to process verifications in PH; 3,875 in HCV. 0 hours for calculation of assets or application of EID	2,128 total hours.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 5: Simplified Income Determination CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Total combined average error rate in: <ul style="list-style-type: none"> • completing verifications • calculating assets • processing the earned income disallowance 	Average error rate of prior to implementation of the activity is 44%. (FY 2011-2012 used to establish the baseline for this metric)	The average error rate is expected to be less than 44%.	The actual average error rate is 3.5%.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 5: Simplified Income Determination CE #5: Increase in Tenant Rent Share				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average tenant rent share in dollars for households with the earned income disallowance and/or local income inclusions.	Average tenant rent share prior to implementation of the activity is \$473. (FY 2015 data used to establish baseline as pre-implementation data is unavailable)	The average tenant rent share is not more than \$720.	The actual average tenant rent share is \$1,003.	No, the outcome does not meet the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

The time study method was revised for the FY 2019 MTW Report. A sample of files was selected for the study and tracked in real-time to determine the total time spent completing verifications, calculating asset income, and processing the Earned Income Disallowance for MTW actions. HACSB intends to use this method for all future time studies.

Through our FY 2019 Annual MTW Plan, HACSB received approval to merge four previously approved MTW activities under this activity with the title “Simplified Income Determination”. Beginning with the 2019 Annual MTW Report, the outcomes of these activities are reported as combined totals.

Standard metric CE #3 was 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. As a result, HACSB does not anticipate that the metric CE #3 will reflect a decrease in the average error rate related to verifications as a direct result of this activity.

HACSB applied a revised time study method. In years without significant changes in the MTW activity and/or related processes, HACSB will use average data from previous years’ time study evaluations. A full time study will be performed periodically to ensure that reported data continues to reflect actual processing time.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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/Impact/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 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 screening customers 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 families who expressed interest in porting to San Bernardino County during the temporary suspension and those families were notified when the suspension was lifted effective December 1, 2020.

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.

Activity 8: Local Policies for Portability CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of portability in dollars.	\$70,060 in FY 2009 Staff cost calculation: 2,004 hours X \$34.96 average staff cost per hour	\$35,029 in FY 2015 and beyond.	\$13,225 Staff Cost Calculation: 378.29 hours X \$34.96 average staff cost per hour.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 8: Local Policies for Portability CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total hours of staff time spent annually to process in-bound portability	2,004 hours in FY 2009	1,002 hours in FY 2010 and beyond.	378.29 hours. Staff Time Calculation: 1.81 hours per port-in x 209 port-ins.	Yes, the outcome meets and exceeds the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

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 families 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 Annual MTW Plan for informational purposes.
 - A non-significant modification was made to allow HACSB to reduce or postpone the minimum rent for HACSB developments or programs serving extremely vulnerable populations.
- FY 2024
 - A non-significant modification was made to remove the requirement for career able Minimum Rent households to participate in supportive services. This modification was made via this FY 2024 MTW Annual Report.

ii. Description/Impact/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 from the current regulatory maximum of \$50 to \$125 per month for all households in both the Public Housing and Housing Choice Voucher Programs. The activity applies to MTW, VASH, and EHV households.

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 families residing at the Desert Haven and Golden Apartments permanent supportive housing sites for homeless and chronically homeless individuals and families to \$0. The family will pay the applicable Streamlined Lease Assistance (MTW Activity 22) rent, with a minimum rent of \$0.

Activity 10: Minimum Rent**CE #5: Increase in Tenant Rent Share**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Rental revenue in dollars (increase).	Rental revenue prior to implementation of the activity (in dollars).	Expected rental revenue after implementation of the activity (in dollars).	Actual rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average tenant rent share in dollars for minimum rent households	Average tenant rent share for minimum rent households prior to implementation of the activity is \$33.	The average tenant rent share for minimum rent households will increase by \$40 to \$73.	The actual average tenant rent share for minimum rent households is \$144.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 10: Minimum Rent**SS #1: Increase in Household Income**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation.	Whether the outcome meets or exceeds the benchmark.
Average earned income of households with TTP at or less than \$125 in dollars.	The average earned income for PH and HCV households with TTP at or less than \$125 prior to implementation of this activity is \$718.	The average earned income for households with TTP at or less than \$125 will increase to \$774.	The average earned income for households with TTP less than or equal to \$125 is \$653.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 10: Minimum Rent

SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline ⁵	Benchmark	Outcome ⁶	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
(1) Employed Full-Time	Head(s) of work-able households employed full-time in FY 2016 is 6.	The number of heads of household employed full-time is not expected to change as a result of this activity.	Heads of work-able households employed full-time is 36.	Yes, the outcome meets and exceeds the benchmark for this metric. The outcome is believed to be the result of other MTW activities.
	Percentage of total work-able households employed full-time in FY 2016 is 9%.	The percentage of work-able households employed full-time is not expected to change as a result of this activity.	Percentage of total work-able households employed full-time is 14%.	Yes, the outcome meets and exceeds the benchmark for this metric. The outcome is believed to be the result of other MTW activities.

⁵ Pre-implementation data for categories 1, 2, 3, 4, and 6 of this metric is unavailable. Baseline figures represent FY 2016 data. Baseline data from 2016 reflects 7% of all minimum rent families and 7% of work-able minimum rent families.

⁶ Outcomes for SS #3 are based upon self-reported data collected from families and may not include all active families.

Activity 10: Minimum Rent – SS #3: Increase in Positive Outcomes in Employment Status (continued)

(2) Employed Part-Time	Head(s) of households employed part-time in FY 2016 is 14.	The number of heads of household employed part-time is not expected to change because of this activity.	Heads of work-able households employed part-time is 19.	Yes, the outcome meets and exceeds the benchmark for this metric. The outcome is believed to be the result of other MTW activities.
	Percentage of total work-able households employed part-time in FY 2016 is 22%.	The percentage of work-able households employed part-time is not expected to change because of this activity.	Percentage of total work-able households employed part-time is 7%.	No, the outcome does not meet the benchmark for this metric.
(3) Enrolled in an Educational Program	Head(s) of households enrolled in an educational program in FY 2016 is 8.	The number of heads of household enrolled in an educational program is not expected to change because of this activity.	Heads of work-able households enrolled in an educational program is 16.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities.
	Percentage of total work-able households enrolled in an educational program in FY 2016 is 12%.	The percentage of work-able households enrolled in an educational program is not expected to change because of this activity.	Percentage of total work-able households enrolled in an educational program is 6%.	No, the outcome does not meet the benchmark for this metric.

Activity 10: Minimum Rent – SS #3: Increase in Positive Outcomes in Employment Status (continued)

(4) Enrolled in Job Training Program	Head(s) of households enrolled in a job training program in FY 2016 is 2.	The number of heads of household enrolled in a job-training program is not expected to change as a result of this activity.	Heads of work-able households enrolled in a job training program is 12.	Yes, the outcome meets the benchmark for this metric. The outcome is believed to be the result of other MTW activities.
	Percentage of total work-able households enrolled in a job training program in FY 2016 is 3%.	The percentage of work-able households enrolled in a job-training program is not expected to change as a result of this activity.	Percentage of total work-able households enrolled in a job training program is 5%.	Yes, the outcome meets the benchmark for this metric.
(5) Unemployed	Head(s) of households unemployed prior to implementation of the activity is 45.	The number of unemployed minimum rent heads of household is expected to be no more than 90% of all minimum rent heads of household.	Heads of work-able households unemployed is 208.	Yes, the outcome meets the benchmark for this metric.
	Percentage of total work-able households unemployed prior to implementation of the activity is 69%	The percentage of work-able unemployed minimum rent households is expected to be no more than 90% of all work-able minimum rent heads of household.	Percentage of total work-able households unemployed is 79%.	Yes, the outcome meets the benchmark for this metric.

Activity 10: Minimum Rent – SS #3: Increase in Positive Outcomes in Employment Status (continued)

(6) Other	Head(s) of households engaged in other activities in FY 2016 is 8.	The number of heads of household engaged in other activities is not expected to change as a result of this activity.	Heads of work-able households engaged in other activities is 24	Yes, the outcome meets and exceeds the benchmark for this metric
	Percentage of total work-able households engaged in other activities in FY 2016 is 12%.	The percentage of work-able households engaged in other activities is not expected to change as a result of this activity.	Percentage of total work-able households engaged in other activities is 9%	No, the outcome does not meet the benchmark for this metric.

Activity 10: Minimum Rent SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number).	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of minimum rent households receiving TANF assistance.	Number of minimum rent households receiving TANF assistance prior to implementation of the activity is 30 of 286 (10.5% of all minimum rent households).	The number of minimum rent households receiving TANF after implementation of the activity is expected to be no more than 50%.	Number of minimum rent households receiving TANF is 46 (12%).	Yes, the outcome exceeds the benchmark for this metric.

Activity 10: Minimum Rent**SS #8: Households Transitioned to Self-Sufficiency**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for “self-sufficiency” to use for this metric. Each time the PHA uses this metric, the “Outcome” number should also be provided in Section (II) Operating Information in the space provided.</i>	<i>Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.</i>	<i>Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
<i>Number of minimum rent households transitioned to self-sufficiency. For purposes of this activity, “self-sufficiency” is defined as having a total gross household income at or above 80% of the Area Median Income for the family size (at the time of end of participation).</i>	The number of minimum rent households transitioned to self-sufficiency prior to implementation of the activity is 0.	The number of minimum rent households expected to transition to self-sufficiency after implementation of the activity is 0.	The number of minimum rent households transitioned to self-sufficiency in FY 2024 is 1.	Yes, the outcome exceeds the benchmark for this metric.

Activity 10: Minimum Rent**Local Metric: Number of Participants with Flexibility to Reduced or Postponed Minimum Rent**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of Permanent Supportive Housing (PSH) minimum rent participants with reduced or postponed minimum rent.	The number of PSH minimum rent participants with reduced or postpone minimum rent prior to implementation of activity is 0.	The expected number of PSH minimum rent participants with reduced or postponed minimum rent after implementation is less than 90% of PSH units (69 total PSH units).	The number of PSH minimum rent participants with flexibility to reduced or postponed minimum rent is 6 (1.3%).	Yes, the outcome meets the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

In FY 2023 we added a local metric in the MTW Report to report on the households who are paying less than \$125 through the flexibility to reduce or postpone the \$125 minimum rent.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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 2017: Modification to apply any family who transitioned from a Housing Authority of the City of Upland (UHA) waiting list to an HACSB waiting list as a result of the HUD-approved voluntary transfer, and who is subsequently admitted from the HACSB waiting list to a HACSB project-based voucher program.
- 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: Modified to consider all PBV units included under a single contract as one building for purposes of determining the number of HQS inspections to be performed.
- FY 2023: Modification to allow PBV units to remain on the PBV contract even if the unit is not leased or no Housing Assistance Payment (HAP) paid for more than 180 days.

ii. Description/Impact/Update

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

HACSB's Local Project-Based Voucher (PBV) program is intended 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:

- Up to 100% percent of units in any development may be project-based;
- Up to 30% of HACSB's MTW baseline number of units may be allocated for PBV (including RAD-PBV units);
- PBV will be allocated to all of the public housing units approved for disposition other than 27 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;
- 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;
- 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 a wrong-sized unit 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 (Valencia Vista and Olive Meadow) of the Waterman Gardens (now Arrowhead Grove) 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 phase (Crestview Terrace) of the Waterman Gardens (now Arrowhead Grove) 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 (now Arrowhead Grove) 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 families 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 families will be notified at move-in as to whether they will be eligible to receive a tenant-based voucher.
 - HACSB will utilize flexibility in applying occupancy standards for existing and/or new project-based voucher developments. The flexibility will be applied at HACSB's discretion based on a determination of need and circumstances related to a specific development, and will include the following components:
 - Alternative Occupancy Standards: Project-based voucher units are subject to HACSB's traditional occupancy standards, which are currently set at a minimum of two persons per bedroom. However, in certain circumstances, HACSB will permit certain project-based units to be occupied using an alternative occupancy standard of up to two persons per bedroom. This flexibility will allow a family to be over-housed by occupying a larger unit than would normally be permitted under the occupancy standards. (Example: a two-person family may lease a two-bedroom unit.)
 - Written Agreement: Prior to exercising this flexibility, HACSB and the PBV owner/manager will enter into a written agreement which specifies the circumstances under which the alternative occupancy standards may be used, including a requirement for the owner/manager to first undertake and demonstrate a reasonable effort, as defined by HACSB, to lease the subject unit to a family using the traditional occupancy standards.
 - Alternative Subsidy Standards: in the event that the alternative occupancy standards are applied, the HAP for the subject project-based unit will be based on the actual unit size.

This modification is used to prevent under-utilization of project-based vouchers in certain circumstances. For example, the flexibility offered by this modification allows the Loma Linda Veterans Village apartment development to provide housing to low-income veteran families. The development is comprised of 87 units, 18 of which are three-bedroom project-based voucher (PBV) units for veteran families. Under the traditional occupancy standards, the three-bedroom units may only be occupied by five- or six-person families. The development began leasing in Fall of 2018, and management had great difficulty in identifying large veteran families to occupy the three-bedroom units under the current traditional occupancy standards. As a result, the units were held vacant while the owner/manager attempted to recruit a five- or six-person family. The flexibility permitted through this component of this activity permitted the three-bedroom units to be leased to smaller low-income veteran families who are in dire need of housing and aligns with HACSB's strategic goal to ensure that no eligible family waits longer than ten days for assistance.

- 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.

Housing Quality Standards (HQS) Inspections Standards – Number of Inspections to be Performed

HACSB will 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 HQS 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 will instead inspect 20% of the 20 total units (4 inspections).

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 project-based voucher (PBV) contract awards. This component has not yet been implemented but is expected to be utilized in the future.

The 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 requirement 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 (career-able) families residing in PBV units. Adult family 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 families. 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 families 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.

Activity 11: Local Project-Based Voucher Program CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of awarding PBV contracts.	Total average cost of awarding PBV contracts prior to implementation of the activity is \$3,438.60. Cost calculation: 60 hours X \$57.31 hour (2015 loaded labor rate)	The expected average cost of awarding PBV contracts after implementation of this activity is \$1,719.30 (50% of baseline).	Actual average cost of awarding PBV contracts is \$687.72. There were no PBV Requests for Proposal in FY 2024. Cost calculation: 12 hours per contract X \$57.31/hour	Yes, the outcome meets and exceeds the benchmark for this activity.

Activity 11: Local Project-Based Voucher Program
CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total average staff time to award PBV contracts.	Total average amount of staff time dedicated to awarding PBV contracts prior to implementation of the activity is 60 hours per contract.	The expected average amount of staff time to award PBV contracts under this activity will decrease by 50%.	The actual average amount of staff time to award PBV contracts under this activity is 12 hours per contract. There were no PBV Requests for Proposal in FY 2024.	Yes, the outcome meets the benchmark for this activity.

Activity 11: Local Project-Based Voucher Program
HC #4: Displacement Prevention

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households at or below 80% AMI that would lose assistance or need to move.	Households losing assistance/moving prior to implementation of the activity is 0. (FY 2015 data used to establish baseline as pre-implementation data is unavailable)	Expected households losing assistance/moving after implementation of the activity is 0.	Displacement was prevented for 1,127 households with income at or below 80% of AMI residing in HACSB PBV units at the end of FY 2024.	Yes, the outcome meets the benchmark for this metric.

Activity 11: Local Project-Based Voucher Program Local Metric: Units of Project-Based Voucher Assistance Added to the HACSB Portfolio				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of units added to the HACSB portfolio because of this activity.	349 units. At the time of implementation 3.76% of the HACSB portfolio consisted of PBV units.	1,856 units. Total PBV units, including units owned by HACSB or its affiliates, will increase to no more than 30% of the HACSB portfolio.	2,629 current and committed PBV units. HACSB has increased its PBV units to 26% of its MTW portfolio (2,629 current and committed units/9,938 MTW baseline units)	Yes, the outcome meets the benchmark.

iii. Actual Non-Significant Changes

None. iv. Actual Changes to Metrics/Data Collection

The benchmark for the local metric was revised through the FY 2019 MTW Report to align with the 30% PBV unit cap established through this activity.

The previously reported standard metric (HC #1: Additional Units of Housing Made Available) was removed per HUD's request during the approval process for HACSB's 2015 Annual MTW Plan. The data previously reported using HC #1 will now be reported using the local metric listed above.

Pre-implementation baseline data for standard metric HC #4 is unavailable. In accordance with written instruction from HUD, data from the first fiscal year for which this metric was reported (FY 2015) was used to establish the baseline.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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: Modified to allow HACSB to conduct mid-year revisions to the Local Payment Standards.

ii. Description/Impact/Update

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

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

This MTW activity allows HACSB to conduct a market assessment to identify submarket areas and develop Local Payment Standards based upon the market assessment for those submarket areas instead of basing the payment standards on the HUD-published Fair Market Rents (FMR). The resulting Local Payment Standards accurately reflect the diverse rental submarkets that exist across the geographically vast and diverse San Bernardino County. Additionally, a non-significant modification made through our approved FY 2023 Annual MTW Plan allows HACSB to revise the LPS mid-year, if necessary, based on local rental market conditions.

Our FY 2017 Annual MTW Plan expanded the use of Local Payment Standards to replace the HUD-published FMR 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 Local Payment Standard 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 families 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 families that have relocated out of these submarkets into other areas of greater opportunity. HACSB anticipates that the number of families relocating to areas of greater opportunity will continue as a result of this activity.

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:

- 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 establish payment standards up to 120% of the 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.

Activity 12: Local Payment Standards
CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost to calculate and apply payment standards.	Total cost to calculate and apply payment standards prior to implementation of the local payment standards activity is \$15,754.70. Cost calculation: 470.43 hours X \$33.49 (2015 loaded labor rate) (FY 2015 data used to establish baseline)	The cost to calculate and apply payment standards in future years is not expected to change. (The baseline value is based on FY 2015, and the activity is fully implemented)	\$13,764.39 Cost calculation: 411 hours X \$33.49	Yes, the outcome does meet the benchmark for this activity.

Activity 12: Local Payment Standards
CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total staff time to calculate and apply payment standards.	<p>470.43 hours spent in FY 2015. (FY 2015 data used to establish baseline as pre-implementation data is unavailable)</p> <p>Staff Time Calculation: 2.7 minutes per file to identify/apply payment standard X 10,454 total actions (recertifications, moves, interims, and port-ins)</p>	<p>No change is anticipated in future years.</p> <p>(The baseline value is based on FY 2015, and the activity is fully implemented)</p>	411 Hours.	Yes, the outcome does meet the benchmark for this activity.

Activity 12: Local Payment Standards
HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households at or below 80% AMI that would lose assistance or need to move.	Households losing assistance/moving prior to implementation of the activity is 308. (FY 2015 data used to establish baseline)	The expected number of households losing assistance/moving after implementation of the activity is not expected to change.	The number of households that would have lost assistance or had to move without this activity is 1,942.	Yes, the outcome meets the benchmark for this activity.

Activity 12: Local Payment Standards
Local Metric: Average HAP Cost

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average HAP cost for MTW units.	The average HAP cost of MTW units prior to implementation of this activity is \$535.87. (FY 2015 data used to establish baseline as pre-implementation data is unavailable)	The average HAP cost for MTW units is not anticipated to change in future years as a direct result of this activity. The baseline value is based on FY 2015, and the activity is fully implemented at this time.	The average HAP cost of MTW units is \$1,385	No. However, the change is believed to be the result of increasing market rents and annual updates to payment standards, which are unrelated to the flexibility authorized through this activity.

Activity 12: Local Payment Standards Local Metric: Households Able to Move from Areas of Poverty and/or Minority Concentration				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Percentage of households residing in submarkets 2 and 6	The percentage of households residing in submarkets 2 and 6 prior to implementation are: Submarket 2: 25% Submarket 6: 21%	The percentage of households residing in submarkets 2 and 6 will decrease by a total of 8% in three years (2014). Submarket 2: 21% Submarket 6: 17%	The percentage of households residing in submarkets 2 and 6 reflects a 17.6% total decrease: Submarket 2: 20.1% (a 4.9 % decrease from the Baseline of 25%) Submarket 6: 8.3% (a 12.7% decrease from the Baseline of 21%)	Yes, the outcome meets and exceeds the benchmark for this activity.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

The time study method was revised for the FY 2024 MTW Report. In years without significant changes in the MTW activity and/or related processes, HACSB will use average data from previous years' time study evaluations. A full time study will be performed periodically to ensure that reported data continues to reflect actual processing time.

Standard metrics CE #1 and CE #2 were added in HACSB's 2015 Annual Plan per HUD's request. The objective of the activity is to increase housing choices for low-income families and has resulted in some additional staff time spent to establish and apply the local payment standards. As a result, HACSB does not anticipate that these metrics will reflect a decrease in agency cost savings or staff time savings as a direct result of this activity.

The previously reported metric *HC #5: Increase in Resident Mobility* was corrected per HUD's comments during the approval process for HACSB's 2015 Annual MTW Plan. The data previously reported using HC #5 is reported using the local metric *Households Able to Move from Areas of Poverty*

and/or Minority Concentration. HC #5 reflects the number of households whose contract rent exceeds 110% of the HUD-Published Fair Market Rent (FMR) and therefore would not be able to lease the selected unit without the HACSB Local Payment Standard Activity. The baseline for this metric was corrected in FY 2018.

Pre-implementation baseline data for standard metrics CE #1, CE #2, and the first local metric is unavailable. In accordance with written instruction from HUD, data from the first fiscal year for which these metrics were reported (FY 2015) was used to establish the baseline.

The local metric *Average HAP Cost* was added through our FY 2015 Annual MTW Report to identify potential HAP savings related to this activity.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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: 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, is included in our Annual MTW Plan for informational purposes.

ii. Description/Impact/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 families. All MTW 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 associated with outsourcing 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 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 extended the validity of a family’s most recently completed biennial HQS inspection by one year. The due date of the family’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 family and property owner/manager that the unit met all HQS requirements to allow the family 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 meet HQS requirements. Deferred initial HQS inspections are prioritized for processing. If 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 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.

Activity 13: Local Inspection Policies CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total annual cost to conduct inspections	Total expenses for inspections is \$707,551	Total expenses for inspections is \$579,392 in two years	\$488,794 Calculation of Cost: \$3,000 Staff cost +\$485,794 Contract costs	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 13: Local Inspection Policies
CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete HQS inspections in staff hours.	<p>Total amount of staff time to complete HQS inspections prior to implementation of the activity was 15,571 hours.</p> <p>Staff Time Calculation: 1.3 hours per inspection X 11,978 inspections performed.</p>	Expected amount of total staff time dedicated to the task after implementation of the activity is 12,282 hours.	<p>89.6 hours.</p> <p>Staff Time Calculation: 0.64 hours per inspection X 140 inspections performed.</p>	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 13: Local Inspection Policies CE #3: Decrease in Error Rate of Task Execution				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average error rate in inspections.	Average error rate of inspections prior to implementation of the activity is 19% (4 errors in 21 files). (FY 2015 data used to establish baseline as pre-implementation data is unavailable)	The average error rate of inspections is not expected to change in future years. (Baseline data is post-implementation)	Actual error rate is 5% (7 errors in 140 files).	Yes, the outcome meets and exceeds the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

The time study method was revised for the FY 2019 MTW Report. A sample of files were selected for the study and were tracked in real-time to determine the total time to conduct and process the inspection. HACSB intends to use this method for future studies. However, a time study could not be performed for FY 2020 or FY 2021 due to the COVID-19 pandemic and the postponement of most in-person inspections. HACSB did not use an in-person time study for inspections for FY 2022, FY 2023 and this year as well. Instead, HACSB utilized data from FY 2019, adding a time inflation factor based on the change in recertification time from FY 2023 to FY 2024, as determined through the time study conducted for recertifications. Standard Metric CE #3 reflects only HACSB staff time. Prior to the FY 2020 Annual MTW Report, the total staff time also included time spent by contracted inspectors.

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.

Pre-implementation baseline data for standard metric CE #3 is unavailable. In accordance with written instruction from HUD, data from the first fiscal year for which this metric was reported (FY 2015) was used to establish the baseline.

The previously reported standard metric *HC #1: Additional Units of Housing Made Available* was removed per HUD's comments during the approval process for HACSB's 2015 Annual MTW Plan.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

Activity 14: Local Asset Management Program

i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval.

ii. Description/Impact/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 Section V.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

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/Impact/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 only applies to the remaining unit 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 SLA tenant rent portion 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 only applies to the remaining unit of our Public Housing portfolio.

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 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. HASCB implemented the following emergency operations for this activity:

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

Emergency operations have ended and normal operations have resumed. However, HASCB continues to offer remote and virtual service options for some interactions. Emergency operations may be reenacted in the future in response to another local disaster, emergency, or other crisis situation.

Activity 18: Property Management Innovation CE #1: Agency Cost Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total cost of task in dollars (decrease).</i>	<i>Cost of task prior to implementation of the activity (in dollars).</i>	<i>Expected cost of task after implementation of the activity (in dollars).</i>	<i>Actual cost of task after implementation of the activity (in dollars).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
Total cost for arbitration services (decrease)	Cost of task prior to implementation of the activity is \$6,550.	Expected costs for arbitration services after implementation of the activity is \$0.	Actual arbitration services cost is \$0.	Yes, the outcome meets the benchmark for this metric.

Activity 18: Property Management Innovation CE #2: Staff Time Savings				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Total time to complete the task in staff hours (decrease).</i>	<i>Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).</i>	<i>Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).</i>	<i>Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
Total staff hours to complete settlement conferences (formerly Grievance Processes).	Staff time spent on informal hearings in CY 2011 is 5.4 hours per hearing (76 hours total / 14 hearings).	Expected amount of staff time spent on informal hearings will decrease by 2.7 hours per hearing (50%).	0 Hours in FY 2024.	Yes, the outcome exceeds the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

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 families 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 families exercising mobility, and non-legacy RAD families 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 families. 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/Impact/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 families we serve to focus on self-sufficiency efforts while we assist them with their housing needs for a limited term. Families served through this activity are provided with up to five years of housing assistance and supportive services. Up to two years of additional assistance may be provided through the hardship exemption process for certain situations.

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 families who have applied for and are selected from the HCV 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.

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. More information about this study is included in section VI.B. of this Report.

Subsidy Calculation:

Families 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 family. No households are currently participating in this component and HACSB does not anticipate admitting new households to this component in the future.

Families joining the activity on or after November 1, 2017: the subsidy calculation mirrors the Streamlined Lease Assistance Program for New Non-Elderly/Non-Disabled Households (Activity 22).

Subsidy Limitation:

This component has not been implemented as of this report but may be implemented if needed to mitigate rising Housing Assistance Payment (HAP) costs. HACSB is authorized to apply a subsidy limitation to families participating in the TLA activity. To encourage families to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB will apply a subsidy limitation to over-housed families. Over-housed families are those who have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher who has chosen to lease a three-bedroom unit is described as over-housed. 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 family, which results in a greater family rent share than if the family 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 families to the average subsidy rate for families 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 families.

Supportive Services:

During the term of assistance, HACSB also provides supportive services to the family through its Family Empowerment Services (FES) department (formerly known as Career Development Initiatives). Families are required to meet with their FES caseworker at least annually to review their action plan and progress. Services provided to families 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 a Family Stabilization Specialist and Employment Services Specialist through HACSB's partnership with the San Bernardino County Transitional Assistance Department;
- Access to other resources designed to provide the family with meaningful support and tools to enhance the family'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 families, and has developed hardship exemptions in four categories:

- **Completion of Self-Sufficiency Activity:** to allow the family to complete an educational, job training, or other approved self-sufficiency activity.
- **Unforeseen and Involuntary Loss of Income**
- **Near-Elderly Family:** 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 households.
- **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:

Beginning July 1, 2021, households admitted to or moving to a new unit under the Term-Limited Assistance (TLA) Program must select a unit whose number of bedrooms is not greater than their voucher size. For example, a family 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 families are also more costly to house than families in right-sized units. HACSB suspended this requirement in order to improve leasing success as of January 2022. This component may be reimplemented in the future if needed as a cost-reduction measure.

Incentive to Move to Areas of High Opportunity:

HACSB may provide incentive to families 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 upon completion of each survey. Feedback obtained through the exit study helps HACSB to understand the family perspective and experience in the TLA program.

Rent Increase Limitation:

HACSB was granted authorization through its 2018 Annual MTW Plan 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. This modification would permit HACSB to cap the rent increase at a value less than 10% of the previous contract rent. This modification will provide HACSB with a mechanism to slow the HAP cost increases resulting from continued rent increases.

This component has not yet been implemented. 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 families, 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 public, HACSB may implement the following temporary changes 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:

- 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 and September 30, 2020, was delayed by six months.

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.

Activity 20: Term-Limited Lease Assistance Program SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation.	Whether the outcome meets or exceeds the benchmark.
Average earned income of families affected by this policy in the Term-Limited Lease Assistance Program.	Average earned income of families affected by this policy Year 1 of the activity was \$12,181.	Expected average earned income of affected families will increase by 45% to \$17,662 by 9/30/2015 and by 75% to \$21,317 by 9/30/2018.	Actual average earned income of affected families is \$15,944.	No, the benchmark for 9/30/2018 has not yet been reached. However, there was an overall increase in average income from FY 2023 to FY 2024.

Activity 20: Term-Limited Lease Assistance Program
SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark	Outcome ⁷	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
(3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.

⁷ Outcomes for SS #3 are based upon self-reported data collected from families participating in the TLA program and may not include all active TLA families.

Activity 20: Term-Limited Lease Assistance Program - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(1) Employed Full-Time	Head(s) of work-able households with full-time employment prior to implementation of the activity is 219 in year 1 of this activity.	Expected head(s) of households with full-time employment after implementation of the activity is 271 by FY 2015 and thereafter.	Actual heads of work-able households with full-time employment is 550.	Yes, the outcome meets the benchmark for this metric.
	Percentage of total work-able households with full-time employment prior to implementation of the activity is 32% in year 1 of this activity.	Expected percentage of total work-able households with full-time employment after implementation of the activity is 39% by FY 2015 and thereafter.	Actual percentage of total work-able households with full-time employment is 36%.	No, the outcome does not meet the benchmark for this metric.
(2) Employed Part-Time	Head(s) of work-able households with part-time employment prior to implementation of the activity is 164 in year 1 of this activity.	Expected head(s) of households with part-time employment after implementation of the activity is 172 by FY 2015 and thereafter.	Actual head(s) of work-able households with part-time employment is 184.	Yes, the outcome does meet the benchmark for this metric.
	Percentage of total work-able households with part-time employment prior to implementation of activity is 24% in year 1 of this activity.	Expected percentage of total work-able households with part-time employment after implementation of the activity is 29% by FY 2015 and thereafter.	Actual percentage of total work-able households with part-time employment is 12%.	No, the outcome does not meet the benchmark for this metric.

Activity 20: Term-Limited Lease Assistance Program - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(3) Enrolled in an Educational Program	Head(s) of work-able households enrolled in an educational program prior to implementation of the activity is 43 in year 1 of this activity.	Expected head(s) of households enrolled in an educational program after implementation of the activity is 100 by FY 2015 and thereafter.	Actual head(s) of work-able households enrolled in an educational program is 124.	Yes, the outcome does meet the benchmark for this metric.
	Percentage of total work-able enrolled in an educational program prior to implementation of activity is 6% in year 1 of this activity.	Expected percentage of total work-able households enrolled in an educational program after implementation of the activity is 14% by FY 2015 and thereafter.	Actual percentage of total work-able households enrolled in an educational program is 8%.	No, the outcome does not meet the benchmark for this metric
(4) Enrolled in Job Training Program	Head(s) of work-able households enrolled in a job training program prior to implementation of the activity is 30 in year 1 of this activity.	Expected head(s) of households enrolled in a job training program after implementation of the activity is 50 by FY 2015 and thereafter.	Actual head(s) of work-able households enrolled in a job training program is 75.	Yes, the outcome does meet the benchmark for this metric.
	Percentage of total work-able enrolled in a job training program prior to implementation of activity is 4% in year 1 of this activity.	Expected percentage of total work-able households enrolled in a job training program after implementation of the activity is 7% by FY 2015.	Actual percentage of total work-able households enrolled in a job training program is 5%.	No, this outcome does not meet the benchmark for this metric.

Activity 20: Term-Limited Lease Assistance Program - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(5) Unemployed	Head(s) of work-able households unemployed prior to implementation of the activity is 329 in year 1 of this activity.	Expected head(s) of households unemployed after implementation of the activity is 270 by FY 2015 and thereafter.	Actual head(s) of work-able households unemployed is 793.	No, the outcome does not meet the benchmark for this metric.
	Percentage of total work-able unemployed prior to implementation of activity is 47% in year 1 of this activity.	Expected percentage of total work-able households unemployed after implementation of the activity is 39% or less by FY 2015 and thereafter.	Actual percentage of total work-able households unemployed is 52%.	No, the outcome does not meet the benchmark for this metric.
(6) Other	Head(s) of work-able households participating in other activities, leading to positive outcomes in employment status prior to implementation of the activity is 0 in year 1 of this activity.	Expected head(s) of households participating in other activities, leading to positive outcomes in employment status after implementation of the activity is 54 by FY 2015 and thereafter.	Actual head(s) of work-able households participating in other activities, leading to positive outcomes in employment status is 241.	Yes, this outcome meets the benchmark for this metric.
	Percentage of total work-able participating in other activities, leading to positive outcomes in employment status prior to implementation of activity is 0% in year 1 of this activity.	Expected percentage of total work-able households participating in other activities, leading to positive outcomes in employment status after implementation of the activity is 8% by FY 2015 and thereafter.	Actual percentage of total work-able households participating in other activities, leading to positive outcomes in employment status is 16%.	Yes, this outcome meets the benchmark for this metric.

Activity 20: Term-Limited Lease Assistance Program
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Percentage of Term-Limited Lease Assistance households receiving TANF assistance.	The number of Term-Limited Lease Assistance households receiving TANF assistance in year 1 of the activity is 267.	The expected number and percentage of Term-Limited Lease Assistance households receiving TANF is less than 600 (50%) ⁸ .	Actual number of Term-Limited Lease Assistance households receiving TANF after implementation of the activity is 862 (43%).	Yes, the outcome meets the benchmark for this metric.

⁸ The expected number of Term-Limited Lease Assistance (TLA) households receiving TANF was added to the benchmark and outcome for this metric beginning with HACSB's FY 2017 report. The number is not an accurate representation of the outcomes related to this activity due to fluctuations in the number of households participating in the program. Therefore, the percentage of TLA households receiving TANF is also provided in order to provide a more accurate representation of the changes.

Activity 20: Term-Limited Lease Assistance Program
SS #5: Households Assisted by Services that Increase Self Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase self-sufficiency (increase).	Households receiving self-sufficiency services prior to implementation of the activity (number).	Expected number of households receiving self-sufficiency services after implementation of the activity (number).	Actual number of households receiving self-sufficiency services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving services aimed to increase self-sufficiency (increase)	Households receiving self-sufficiency services in Year 1 of the activity is 695.	The expected number of households receiving services aimed to increase self-sufficiency after implementation of the activity is 100% of families participating in the Term-Limited Lease Assistance Program.	Actual households receiving self-sufficiency services is 1,377 (69.86%). (1,971 TLA participants for FY 2024).	No, the outcome does not meet the benchmark for this metric.

Activity 20: Term-Limited Lease Assistance Program SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.</i>	<i>Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.</i>	<i>Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
<i>For this activity, HACSB defines self-sufficiency as "Termination of housing assistance and other forms of government assistance (TANF, CalWORKs, cash aid, etc.) due to an increase in income in attainment of and/or increased level in employment to transition to market-rate housing or homeownership in the 5-year program timeframe."</i>	Households transitioned to self-sufficiency prior to implementation of the activity is 0.	Expected households transitioned to self-sufficiency after implementation of the activity is 174 or 25% of participating families by September 30, 2017.	Actual households transitioned to self-sufficiency under this activity in FY 2024 is 187 (9.4%).	Yes, the outcome does meet the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

Meeting the benchmark for metric SS#1 is challenging because the data analysis provides a snapshot of the average earned income for all households in the program, comparing those in their first year to those in their fifth year or beyond. This approach skews the results, as newer participants have not had enough time to achieve the same outcomes as long-term participants, resulting in an uneven comparison.

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 households newly admitted to or 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, and households participating in the Family Self-Sufficiency (FSS) program.

The rent for families in the Streamlined Lease Assistance (SLA) program is calculated based on a percentage of gross annual income. The HACSB minimum rent and baseline rent established through this activity also apply. The rent percentages were established based on initial 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 as described below.

Fixed Assistance Program for Elderly/Disabled Households:

Elderly/Disabled Households admitted prior to January 1, 2019: The household’s rent share (total tenant portion or “TTP”) is the greatest of 24% of their gross income, the HACSB MTW minimum rent, or baseline rent (described below).

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

Households admitted on or after January 1, 2019: The family’s rent share (TTP) is the greatest of 30% of their gross income, the minimum rent, or baseline rent (described below). This component was implemented for new families briefed on or after January 1, 2019.

Tiered Assistance Program for Non-Elderly/Non-Disabled (Career-Able) Households:

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

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

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

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

The baseline rent for each family is the set at their highest family 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>	
Family Monthly Gross Income:	\$1,000	Family Monthly Gross Income:	\$900
Tier 1 Calculated Rent (30%):	\$300 ← Family 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 ← Family Rent Share

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

This component previously utilized four rent tiers which set the family’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 families 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 families in the program at the time of the revision and those admitted since that time have remained at the 30% rent tier.

When the modification was approved, HACSB stated its intention to implement the additional rent tiers of 33% and 36% only if internal analysis demonstrated that their implementation was necessary to ensure financial viability of the program without terminating assistance or serving fewer households. We have continued to monitor program costs and households rent burden and determined that implementation of the additional rent tiers was appropriate and necessary. The 36% tier was implemented effective October 1, 2024, for all current SLA non-elderly/non-disabled households with an automatic six-month hardship exemption which delays any change in their rent portion to April 1, 2025. This adjustment is urgently needed to reduce housing assistance payment (HAP) expenses and per-unit costs (PUC) and avoid entering a shortfall situation.

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

Beginning July 1, 2021, households admitted to or moving to a new unit under this activity must select a unit whose number of bedrooms is not greater than their voucher size. For example, a family 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 families are also more costly to house than families in right-sized units. HACSB suspended this requirement in order to improve leasing success as of January 2022. This component may be reimplemented in the future if needed as a cost-reduction measure.

Subsidy Limitation:

This component is on hold and has not been implemented as of this report. HACSB is authorized to apply a subsidy limitation to families participating in the SLA activity. To encourage families 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 families. These are families that have voluntarily selected and leased a unit that is larger than their voucher size. For example, a family with a two-bedroom voucher who has chosen to lease a three-bedroom unit is described as over-housed. 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 family, which results in a greater family rent share than if the family 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 families to the average subsidy rate for families 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 re-implementation of the requirement is needed. We anticipate that we will re-implement the requirement in the future.

Rent Increase Limitation (voucher programs only):

This component is on hold and has not been implemented. 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, if the average value of rent increases approved in the prior FY was 10% of the previous contract rent, then HACSB would cap the rent increase at a value less than 10% of the previous contract rent.

HACSB is currently considering to implement this component as an additional strategy to reduce costs and prevent shortfall. .

Hardship Exemptions:

HACSB recognizes that families 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 may be approved for the following reasons:

- Death of a family member with income;

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

Temporary hardship exemptions may be approved for the following reasons:

- Unforeseen and 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 families only.
- Unforeseen involuntary permanent loss of income for an adult family member who is attending high school.

If approved, the hardship exemption's effective date is set at the first of the month following the submission of the request.

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.

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:

- SLA families 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 families 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 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.

Activity 22: Streamlined Lease Assistance Program
CE #1: Agency Cost Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total cost of task in dollars (decrease).	Cost of task prior to implementation of the activity (in dollars).	Expected cost of task after implementation of the activity (in dollars).	Actual cost of task after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Total cost of recertifications.	<p>Total cost of recertifications prior to implementation of this activity is \$176,524 in FY 2014</p> <p>\$165,492 staff cost + \$11,032 postage cost</p> <p>Staff Cost Calculation: 4,943 hours X \$33.48 per hour</p>	\$158,872 in FY 2017 and beyond.	<p>\$112,474</p> <p>\$105,261 staff cost + \$7,213 postage cost</p> <p>Staff Cost Calculation: 3,144 hours X \$33.48 per hour</p>	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
CE #2: Staff Time Savings

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Total time to complete the task in staff hours (decrease).	Total amount of staff time dedicated to the task prior to implementation of the activity (in hours).	Expected amount of total staff time dedicated to the task after implementation of the activity (in hours).	Actual amount of total staff time dedicated to the task after implementation of the activity (in hours).	Whether the outcome meets or exceeds the benchmark.
Total time to complete recertifications in staff hours.	Total amount of staff time dedicated to recertifications prior to implementation of the activity is 4,943 hours in FY 2014 Staff Time Calculation: 4,413 recertifications X 1.12 hours per recertification.	4,449 hours in FY 2017 and beyond.	3,144 Hours. Staff Time Calculation: 2,642 SLA recertifications performed X 1.19 hours per recertification.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
CE #3: Decrease in Error Rate of Task Execution

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average error rate in completing a task as a percentage (decrease).	Average error rate of task prior to implementation of the activity (percentage).	Expected average error rate of task after implementation of the activity (percentage).	Actual average error rate of task after implementation of the activity (percentage).	Whether the outcome meets or exceeds the benchmark.
Average error rate in completing recertifications as a percentage.	Average error rate of recertifications prior to implementation of the activity is 11%.	The average error rate of recertifications is not expected to change as a result of this activity.	The actual average error rate of recertifications is 2%.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
SS #1: Increase in Household Income

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation.	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars.	Average earned income of households affected by this policy prior to implementation of the activity is \$4,454.	The expected average earned income of SLA households is not expected to change in years 1 and 2 (FY 2015 and FY 2016) after implementation of the activity. The average earned income for SLA households is expected to increase by 3% in FY 2018, FY 2020, and FY 2022.	The actual average earned income of Streamlined Lease Assistance households is \$9,166.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline ⁹	Benchmark	Outcome ¹⁰	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
(1) Employed Full-Time	Head(s) of work-able households employed full-time in FY 2016 is 76.	Expected head(s) of households with full-time employment after implementation of the activity is 103 by FY 2021 and thereafter.	Actual heads of work-able households with full-time employment is 976.	Yes, the outcome meets and exceeds the benchmark for this metric.
	Percentage of total work-able households employed full-time in FY 2016 is 29%.	Expected percentage of total work-able households with full-time employment after implementation of the activity is 36% by FY 2021 (7% increase) and thereafter.	Actual percentage of work-able households with full-time employment is 32%.	No, this outcome does not meet the benchmark for tis metric.

⁹ Pre-implementation data for categories 1, 2, 3, 4, and 6 of this metric is unavailable. Baseline figures represent FY 2016 data. Baseline data from 2016 for parts 1, 2, 3, 4, and 6 reflects 8% of all Streamlined Lease Assistance families and 8% of work-able Streamlined Lease Assistance families.

¹⁰ Outcomes for SS #3 are based upon self-reported data collected from families and does not include all active families.

Activity 22: Streamlined Lease Assistance Program - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(2) Employed Part-Time	Head(s) of work-able households employed part-time in FY 2016 is 58.	No change is anticipated. Some heads of household will move from unemployment to part-time employment, and others will move from part-time to full-time employment.	Actual heads of work-able households with part-time employment is 443.	Yes, the outcome meets the benchmark for this metric.
	Percentage of total work-able households employed part-time in FY 2016 is 22%.	No change is anticipated. Some heads of household will move from unemployment to part-time employment, and others will move from part-time to full-time employment.	Actual percentage of work-able households with part-time employment is 14%.	No, this outcome does not meet the benchmark for this metric.
(3) Enrolled in an Educational Program	Head(s) of work-able households enrolled in an educational program in FY 2016 is 27.	No change is anticipated. This activity is expected to result in employment changes, but no changes to educational activity.	Actual heads of work-able households enrolled in an educational program is 222.	Yes, the outcome meets the benchmark for this metric.
	Percentage of total work-able households enrolled in an educational program in FY 2016 is 10%.	No change is anticipated. This activity is expected to result in employment changes, but no changes to educational activity.	Actual percentage of work-able households enrolled in an educational program is 7%.	No, this outcome does not meet the benchmark for this metric in percentage terms.

Activity 22: Streamlined Lease Assistance Program - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(4) Enrolled in Job Training Program	Head(s) of work-able households enrolled in a job training program in FY 2016 is 5.	No change is anticipated. This activity is expected to result in employment changes, but no changes to job training activity.	Actual heads of households enrolled in a job training program is 104.	Yes, the outcome meets the benchmark for this metric.
	Percentage of total work-able households enrolled in a job training program in FY 2016 is 2%.	No change is anticipated. This activity is expected to result in employment changes, but no changes to job training activity.	Actual percentage of work-able households enrolled in a job training program in is 3%.	Yes, the outcome meets the benchmark for this metric.
(5) Unemployed	Potential future SLA head(s) of households unemployed prior to implementation of the activity in FY 2014 is 7,103 of 9057 (78.4%)	Expected head(s) of households unemployed after implementation of the activity is 6,738 (74.4%) by FY 2021 (4% decrease) and thereafter.	Head(s) of households unemployed is 1,644.	Yes, the outcome meets and exceeds the benchmark for this metric.
	Percentage of potential future SLA total work-able households unemployed prior to implementation of the activity in FY 2014 is 60% (2,655 of 4,425)	Expected percentage of total work-able households unemployed after implementation of the activity is 53% by FY 2021 (7% decrease) and thereafter.	Percentage of total work-able households unemployed is 54%. *3,063 (31%) self-reported surveys were submitted and only represent a small portion of actually assisted households.	No, this outcome does not meet the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(6) Other	Head(s) of work-able households engaged in other activities in FY 2016 is 13.	Expected head(s) of households participating in other activities, leading to positive outcomes in employment status after implementation of the activity is 54 by FY 2015 and thereafter.	Actual heads of households participating in other activities is 363.	Yes, the outcome meets and exceeds the benchmark for this metric.
	Percentage of total work-able households engaged in other activities in FY 2016 is 5%.	Expected percentage of total work-able households participating in other activities, leading to positive outcomes in employment status after implementation of the activity is 8% by FY 2015 and thereafter.	Actual percentage of work-able households participating in other activities is 12%.	Yes, the outcome meets the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of Streamlined Lease Assistance households receiving TANF assistance.	Households that would convert to Streamlined Lease Assistance in year 1 and were receiving TANF prior to implementation of the activity is 2,377 out of 9,055 households (26.3%).	The number of SLA households receiving TANF is not expected to change as a result of this activity.	Streamlined Lease Assistance Households receiving TANF is 2,227 (23%) of current Streamlined Lease Assistance households.	Yes, the outcome exceeds the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
SS #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars.	Average HAP subsidy per household affected by this policy prior to implementation of the activity is \$575.	The average HAP subsidy for SLA households is not expected to decrease in years 1 and 2 (FY 2015 and FY 2016) after implementation of the activity. The average HAP subsidy for SLA households is expected to decrease by 3% in FY 2018, FY 2020, FY 2022, and thereafter.	Average HAP subsidy per Streamlined Lease Assistance household is \$1,157.	No. However, tenant rent shares are also increasing (see SS #7) which illustrates that the HAP subsidy increase reflected here is related to the overall increase in rents for assisted households.

Activity 22: Streamlined Lease Assistance Program
SS #7: Increase in Tenant Rent Share

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average tenant rent share of Streamlined Lease Assistance households.	Average tenant rent share prior to implementation of the activity for households eligible for Streamlined Lease Assistance is \$270.	The average tenant rent share for SLA households is not expected to change as a result of this activity.	Average tenant rent share of Streamlined Lease Assistance households is \$545.	Yes, the outcome meets and exceeds the benchmark for this metric.

Activity 22: Streamlined Lease Assistance Program
SS #8: Households Transitioned to Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
<i>Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.</i>	<i>Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.</i>	<i>Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).</i>	<i>Whether the outcome meets or exceeds the benchmark.</i>
<i>Number of Streamlined Lease Assistance (SLA) households transitioned to self-sufficiency (increase). For purposes of this activity, "self-sufficiency" is defined as having a total gross household income at or above 80% of the Area Median Income for the family size (at time of end of participation).</i>	Number of SLA households transitioned to self-sufficiency prior to implementation of the activity in FY 2014 is 37.	Expected number of SLA households transitioned to self-sufficiency as a result of the SLA activity is 0.	Actual number of SLA households transitioned to self-sufficiency in FY 2024 is 133. Cumulative total is 382.	Yes, the outcome meets and exceeds the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

The time study method was revised for the FY 2019 MTW Report. A sample of files were selected for the study and were tracked in real-time to determine the total time to process the Streamlined Lease Assistance recertification. In years without significant changes in the MTW activity and/or related processes, HACSB will use average data from previous years' time study evaluations. A full time study will be performed periodically to ensure that reported data continues to reflect actual processing time.

Standard metrics SS #3, SS #4, SS #7, and SS #8 were added in HACSB's 2015 Annual Plan per HUD comment. 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 positive outcomes in employment status, households removed from TANF, increase in tenant rent share, or households transitioned to self-sufficiency as a direct result of this activity.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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.
- FY 2024: Modified to reflect households admitted to the program prior to October 1, 2019, and residing in units where the project-based voucher is expiring will transition to the tenant-based voucher program.

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 coupled with supportive services provided through community partners.

Through this activity, any combination of sixty (60) project-based vouchers and/or tenant-based vouchers are made available to eligible low-income unsheltered families, in either of the following categories:

- 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) or through other partners including (but not limited to) local community service providers, school districts, and the Sheriff's H.O.P.E. Team. 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 families will transition to the Term-Limited Lease Assistance (TLA) program and elderly/disabled families will transition to Streamlined Lease Assistance (SLA). This modification applies to new NCLU families admitted on or after October 1, 2019. This component of the activity was put on hold due to the COVID-19 pandemic. NCLU families who were admitted to the program between January 1, 2020, and December 31, 2022, will transition to another HACSB program after four years of NCLU program participation. All households admitted to the program after December 31, 2022, will transition to another HACSB program after two years of NCLU program participation.

Households admitted to the program before October 1, 2019, and residing in units where the PBV contract is expiring, will transition to the tenant-based voucher program and the NCLU program label will be removed. This change will have no impact on the household as they will not be required to move from the unit and their rent portion will continue to be calculated using the SLA methodology. Removing the NCLU program label will allow HACSB to house additional homeless families with children and/or young adults in San Bernardino County's Foster Care Aftercare 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. The total term of assistance may not exceed three years.

HACSB is currently focusing on serving households meeting the criteria for this component through the Family Unification Program (FUP). We will keep this component active for anticipated future use.

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 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 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 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.

Activity 23: No Child Left Unsheltered
CE #4: Increase in Resources Leveraged

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Amount of funds leveraged in dollars (increase).	Amount leveraged prior to implementation of the activity (in dollars). This number may be zero.	Expected amount leveraged after implementation of the activity (in dollars).	Actual amount leveraged after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Amount of funds leveraged in dollars.	Amount of funds leveraged prior to implementation of the activity is \$0.00.	The expected amount of funds leveraged after implementation of the activity is \$35,000.	The actual amount of funds leveraged is \$100,235 in FY 2024.	Yes, the outcome exceeds the benchmark for this metric.

Activity 23: No Child Left Unsheltered
SS #8: Households Transitioned to Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
For purposes of this activity, "self-sufficiency" is defined as having a total gross household income at or above 80% of the Area Median Income for the family size (at time of end of participation).	The number of households transitioned to self-sufficiency prior to implementation of the activity is 0.	The expected number of households transitioned to self-sufficiency after implementation of the activity is 0.	The actual number of households transitioned to self-sufficiency in FY 2024 is 0.	Yes, the outcome meets the benchmark for this metric.

Activity 23: No Child Left Unsheltered
HC #3: Decrease in Wait List Time

Unit of Measurement	Baseline ¹¹	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
Average applicant time on wait list in months.	The average applicant time on wait list for NCLU families is 1.96 months (58.85 days).	The average applicant time on wait list for NCLU families is not expected to change in future years, as this activity is already fully implemented.	The average application wait time for current NCLU families is 267 days.	No, the outcome does not meet the benchmark for this activity; no reduction in wait list time was anticipated, but some fluctuations are expected.

¹¹ Pre-implementation data for this metric is unavailable. Baseline figure represents FY 2016 data.

Activity 23: No Child Left Unsheltered HC #7: Households Assisted by Services that Increase Housing Choice				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving services aimed to increase housing choice (increase).	Households receiving this type of service prior to implementation of the activity (number). This number may be zero.	Expected number of households receiving these services after implementation of the activity (number).	Actual number of households receiving these services after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households receiving services aimed to increase housing choice.	Number of households receiving services aimed to increase housing choice prior to implementation of this activity is 0.	The expected number of households receiving services aimed to increase housing choice after implementation of this activity is 5 per year.	An unknown # of NCLU households received services aimed to increase housing choice. Due to staffing changes, tracking of this metric is not available this year.	No, the outcome does not meet the benchmark for this metric.

Activity 23: No Child Left Unsheltered Local Metric: Households Housed through This Activity				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households housed through the No Child Left Unsheltered activity.	The number of households housed through the No Child Left Unsheltered activity prior to implementation of the activity is 0.	The expected number of households housed through this activity is 5 per year.	31 households were housed through this activity at FYE 2024.	Yes, the outcome meets the benchmark for this local metric.

iii. Actual Non-Significant Changes

Modified language in the activity description to specify that the NCLU program label will be removed from the household when a household transitions from a project-based voucher to a tenant-based voucher. See the activity description for more details.

iv. Actual Changes to Metrics/Data Collection

Standard metrics CE #4, SS #8, HC #3, and HC #7 were added in HACSB's 2015 Annual Plan per HUD's request.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

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.

ii. Description/Impact/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.

To create more housing opportunities for families on our Public Housing and Housing Choice Voucher waiting lists, and in recognition of certain families attaining self-sufficiency, HACSB has implemented this activity to transition families who have an annual income which exceeds 80% of area median income (“over-income”) off 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, families will transition to receiving no housing assistance from HACSB. Public Housing and Project-Based Voucher families will be required to move, and HCV families may choose to remain in their current unit with no assistance or locate 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.

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, will be removed from the six-month transition period, 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 family will be removed from the six-month transition period and will not transition off the program.

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 family 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 family.
- Sixty (60) days prior to the end of the transition period HACSB will issue a reminder notice to the family, 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 family.

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 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 for this activity:

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

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.

Activity 24: Transition for Over-Income Public Housing/Housing Choice Voucher Families
SS #8: Households Transitioned to Self-Sufficiency

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households transitioned to self-sufficiency through the Over-Income activity. For purposes of this activity, "self-sufficiency" is defined as having a total gross household income at or above 80% of the Area Median Income for the family size.	The number of households transitioned to self-sufficiency through the over-income activity prior to implementation of the activity is 0.	The expected number of households transitioned to self-sufficiency after implementation of the activity is 4 per year.	The actual number of households transitioned to self-sufficiency through the over-income activity in FY 2024 is 26.	Yes, the outcome meets the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

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

i. Plan Year Approved, Implemented, Amended

- FY 2016: Initial approval.

ii. Description/Impact/Update

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

The Horizons at Yucaipa Affordable Senior Housing development is a two-phase, 77-unit new construction development in the City of Yucaipa, developed in partnership with Housing Partners I, Inc. (HPI). This activity allows HACSB to apply a modified definition of elderly for the project-based vouchers at the Horizons at Yucaipa development 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 Services Act (MHSA). For purposes of this property, there are two definitions of an elderly (senior) individual.

Phase I:

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. The 50 total units are comprised of 38 one-bedroom units of approximately 692 sq. ft. per unit and 12 two-bedroom units of approximately 967 sq. ft. per unit. The 50 units are within one two-story building with two elevators. Ten of the Phase I units are reserved as Mental Health Services Act (MHSA) units. For these 10 units, an elderly (senior) individual is defined as one who is 60 years of age or older to meet the MHSA requirements. For the remaining 40 PBV units, an elderly (senior) individual is defined as one who is 55 years of age or older to meet the City of Yucaipa's senior housing requirements. Construction of Phase I began in 2015 and was completed in the spring of 2017. The phase achieved full lease-up and full occupancy by May 2017.

Phase II:

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

HPI continues to look for financing options to move forward with planning and development of Phase II of Horizons at Yucaipa. In anticipation of lower interest rates in 2025, HPI will review multiple funding models for the additional 27-unit senior development.

Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing HC #4: Displacement Prevention				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.	Households losing assistance/moving prior to implementation of the activity (number).	Expected households losing assistance/moving after implementation of the activity (number).	Actual households losing assistance/moving after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households at or below 80% AMI that would lose assistance or need to move. Units designated for seniors 55 years of age and older.	Zero (0).	Zero (0).	Zero (0).	Yes, the outcome meets the benchmark for this metric.

Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing
HC #5: Increase in Resident Mobility

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase)	Households able to move to a better unit and/or neighborhood of opportunity prior to implementation of the activity (number). This number may be zero.	Expected households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Actual increase in households able to move to a better unit and/or neighborhood of opportunity after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of households residing in PBV units at Horizons at Yucaipa Senior Housing.	Zero (0).	FYE 2016: Zero (0). FYE 2017 and thereafter: 49	49 households resided in PBV units at Horizons at Yucaipa Senior Housing (47 as of 9/30/2024). The occupancy rate for FY 2024 was 97.6%.	Yes, the outcome meets the benchmark for this metric.

Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing
Local Metric: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of new housing units made available for households at or below 80% AMI as a result of the activity. Units designated for seniors 55 years of age and older.	Zero (0).	FYE 2016: Zero (0). FYE 2017: Forty-Nine (49) and thereafter.	Forty-nine housing units were made available in FY 2017 and continue to be available to low-income households in FY 2024.	Yes, the outcome meets the benchmark for this metric.

Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing Local Metric: Seniors 55 to 60 years of age housed through this activity				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of seniors 55 to 60 years of age housed through this activity.	Number of seniors 55 to 60 years of age housed through this activity prior to implementation of the activity.	Expected number of seniors 55 to 60 years of age housed through this activity after implementation of the activity.	Actual number of seniors 55 to 60 years of age housed through this activity after implementation of the activity.	Whether the outcome meets or exceeds the benchmark.
Number of seniors 55 to 60 years of age housed in PBV units at Horizons at Yucaipa Senior Housing.	Zero (0).	FYE 2016: Zero (0). FYE 2017: Thirty-Nine (39) in Phase I and thereafter.	46 households ages 55-60 resided in PBV units at Horizons at Yucaipa Senior Housing during FY 2024.	Yes, the outcome meets the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

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/Impact/Update

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 structures¹². In the immediate aftermath, approximately 70 families displaced by the fire needed temporary assistance to stabilize their housing situation.

The Blue Cut Fire illustrated the need for HACSB to have in place a mechanism to provide temporary housing assistance to families in the event of certain local disasters. This proposed activity is designed to meet that need.

Through this activity HACSB will implement a short-term rental assistance program to provide temporary housing choice voucher assistance to families displaced as the result of a local disaster. Except as noted below, HACSB's policies for the Housing Choice Voucher Program shall apply to the Local Disaster Short-Term Rental Assistance Program.

HACSB received approval of this activity via its 2017 Annual MTW Plan, Amendment 2, in April 2017, and the activity was incorporated into HACSB policy in June 2017. This activity is fully implemented; however, HACSB will only house families through this activity in the event of a locally declared disaster. No such disasters were declared in FY 2019 or to date, and there are no outcomes to report for this activity.

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.

¹² "CalFire Incident Information – Blue Cut Fire," fire.ca.gov, August 23, 2016. http://www.fire.ca.gov/current_incidents/incidentdetails/Index/1391

Eligibility

Assistance in this program will be limited to families displaced as the direct result of a local disaster. Families assisted through this activity will be subject to eligibility screening. At a minimum, each family 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 families 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

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

Subject to Availability

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

Activity 26: Local Disaster Short-Term Rental Assistance Program HC #3: Decrease in Wait List Time				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average applicant time on wait list in months (decrease).	Average applicant time on wait list prior to implementation of the activity (in months).	Expected average applicant time on wait list after implementation of the activity (in months).	Actual average applicant time on wait list after implementation of the activity (in months).	Whether the outcome meets or exceeds the benchmark.
Average applicant time on wait list in months.	Average applicant time on wait list prior to implementation of this activity.	Expected average applicant time on wait list for this activity after implementation.	<i>N/A. This activity has not yet been utilized.</i>	<i>N/A. This activity has not yet been utilized.</i>

Activity 26: Local Disaster Short-Term Rental Assistance Program Local Metric: Number of Households Served through the Activity				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
The number of households receiving Short-Term Rental Assistance through this activity.	The number of households receiving Short-Term Rental Assistance through this activity is 0.	The expected number of households receiving Short-Term Rental Assistance through this activity is 50 or fewer per year.	<i>N/A. This activity has not yet been utilized.</i>	<i>N/A. This activity has not yet been utilized.</i>

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

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/Impact/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 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 Day Creek 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.

HACSB Subsidy and Income Band TTP Calculation – Type One

Through this activity, the total tenant portion (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 applies 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 Day Creek Villas community in Rancho Cucamonga, which began occupancy in the fall of 2020, utilizes this Type Two calculation.

The total tenant portion (TTP) and HAP subsidy 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 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 will be 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 compliant with HACSB's policies, program rules, and regulations.

A hardship exemption may be approved for the following reasons:

1. The family experiences a death of a household member with income;
2. Any income-earning member of the assisted family 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 family 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 family 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%.

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 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 single-fund flexibility in the same manner as HAP.

Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments
HC #1: Additional Units of Housing Made Available

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase). If units reach a specific type of household, give that type in this box.	Housing units of this type prior to implementation of the activity (number). This number may be zero.	Expected housing units of this type after implementation of the activity (number).	Actual housing units of this type after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of new housing units made available for households at or below 80% AMI as a result of this activity (increase).	Zero (0). No housing units of this type and with the tenant rent and HACSB subsidy calculations exist at the time of this proposal.	116 RAD-PBV tax credit units will be developed and subject to this activity.	116 RAD-PBV tax credit units were available for households at or below 80% AMI during the FY.	<i>Yes, the outcome meets the benchmark.</i>

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

Activity 28: Leasing Success Strategies

i. Plan Year Approved, Implemented, Amended

- FY 2022: Initial approval for landlord incentives through FY 2022 Annual MTW Plan.
- FY 2022: Modified to include housing navigation services and supportive services through FY 2022 Annual MTW Plan, Amendment 1.

ii. Description/Impact/Update

The 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.

This activity is currently on hold due to funding constraints. One or both components may be reimplemented in the future as funding allows and as needed to support leasing efforts.

Signing Bonus

Through this activity, HACSB provided a one-time \$1,000 signing bonus for each new Housing Assistance Payment (HAP) Contract signed HACSB has established the following eligibility criteria for the incentive:

- The assisted unit must be located in HACSB's service area (the entire County of San Bernardino excluding the City of Needles); and
- Voucher holder must be a new program participant or existing program participant who is new to the rental property; and
- Executed lease and contract with all required addendums are required before the signing bonus payment 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. HACSB implemented the signing bonus in early 2022, however due to funding, HACSB ended this strategy in May 2024.

Housing Navigation Services

Housing navigation services and other supportive services, approved in HACSB's 2022 MTW Annual Plan, Amendment 1, were implemented in November 2022. This component was approved as a temporary modification and was anticipated to be in place for no more than 1-2 years to support leasing efforts during the extremely competitive and tight rental market resulting from the COVID-19 pandemic.

While this component is active, housing navigation and supportive services are offered only to families 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 family experiences homelessness after vacating their previous unit. Housing navigation and supportive services will be made available to each family, through a contracted vendor, for the duration of the family's voucher search and will end when the family successfully leases a unit. All services are voluntary; HACSB will offer the services at the time of voucher issuance, but the family 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, and transportation services (if applicable). All components of this activity are subject to availability of funding.

Activity 28: Leasing Success Strategies Local Metric: Average Number of Days from Voucher Issuance to Lease Start				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average number of days from voucher issuance to lease start date.	The average number of days from voucher issuance to lease start date prior to implementation of the activity is 93.73 days.	The expected average number of days from voucher issuance to lease start date is 84.35 days or less.	The actual average number of days from voucher issuance to lease start date at FYE 2024 is 51 days.	Yes, the outcome meets the benchmark for this local metric.
Activity 28: Leasing Success Strategies Local Metric: Successful Lease Rate				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Successful Lease Rate: the percentage of vouchers issued during the fiscal year that result in a successful lease during the fiscal year.	The percentage of vouchers issued during the baseline period (see section iv. below) that resulted in a successful lease is 29.5%.	The expected percentage of vouchers issued during the fiscal year that result in a successful lease after implementation of this activity is 48% or more.	The actual percentage of vouchers issued during the fiscal year that resulted in a successful lease is 27.7%.	No, the outcome does not meet the benchmark for this local metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

HACSB stopped pulling from the waitlist in May 2023. The outcome reflects reinstated vouchers during the fiscal year.

v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

Activity 29: Moving On Strategy

i. Plan Year Approved, Implemented, Amended

- FY 2023: Initial approval through FY 2023 Annual MTW Plan.

ii. Description/Impact/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 customers 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% of their gross income, the HACSB minimum rent, or SLA baseline rent. All other components of the SLA activity apply to Moving On households.

Activity 29: Moving On Strategy SS #1: Increase in Household Income				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average earned income of households affected by this policy in dollars (increase).	Average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Expected average earned income of households affected by this policy prior to implementation of the activity (in dollars).	Actual average earned income of households affected by this policy prior to implementation.	Whether the outcome meets or exceeds the benchmark.
Average earned income of households affected by this policy in dollars.	Average earned income of households affected by this policy prior to implementation of the activity is \$21,586.	The expected average earned income of households is not expected to change after implementation of the activity.	The actual average earned income of Moving On households is \$6,910.	No, the outcome does not meet the benchmark for this metric.

Activity 29: Moving On Strategy
SS #3: Increase in Positive Outcomes in Employment Status

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Report the following information separately for each category: (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program (5) Unemployed (6) Other	Head(s) of households in <<category name>> prior to implementation of the activity (number). This number may be zero.	Expected head(s) of households in <<category name>> after implementation of the activity (number).	Actual head(s) of households in <<category name>> after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
	Percentage of total work-able households in <<category name>> prior to implementation of activity (percent). This number may be zero.	Expected percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Actual percentage of total work-able households in <<category name>> after implementation of the activity (percent).	Whether the outcome meets or exceeds the benchmark.
(1) Employed Full-Time	Head(s) of work-able households employed full-time in FY 2024 is 1.	Expected head(s) of households with full-time employment is not expected to change.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
	Percentage of total work-able households employed full-time in FY 2024 is 3.8%.	Expected percentage of total work-able households with full-time employment is not expected to change.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.

Activity 29: Moving On Strategy - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(2) Employed Part-Time	Head(s) of work-able households employed part-time in FY 2024 is 4.	No change is anticipated. Some heads of household will move from unemployment to part-time employment, and others will move from part-time to full-time employment.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
	Percentage of total work-able households employed part-time in FY 2024 is 15.4%.	No change is anticipated. Some heads of household will move from unemployment to part-time employment, and others will move from part-time to full-time employment.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
(3) Enrolled in an Educational Program	Head(s) of work-able households enrolled in an educational program in FY 2024 is 0.	No change is anticipated. This activity is expected to result in employment changes, but no changes to educational activity.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
	Percentage of total work-able households enrolled in an educational program in FY 2024 is 0%.	No change is anticipated. This activity is expected to result in employment changes, but no changes to educational activity.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.

Activity 29: Moving On Strategy - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(4) Enrolled in Job Training Program	Head(s) of work-able households enrolled in a job training program in FY 2024 is 0.	No change is anticipated. This activity is expected to result in employment changes, but no changes to job training activity.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
	Percentage of total work-able households enrolled in a job training program in FY 2024 is 0.	No change is anticipated. This activity is expected to result in employment changes, but no changes to job training activity.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
(5) Unemployed	Moving On Strategy head(s) of households unemployed prior to implementation of the activity in FY 2024 is to 21.	Expected head(s) of households unemployed after implementation of the activity is not expected to change as the result of this activity.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.
	Moving On Strategy total work-able households unemployed prior to implementation of the activity in FY 2024 is to 81%.	Expected percentage of total work-able households unemployed after implementation of the activity is not expected to change as the result of this activity.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.

Activity 29: Moving On Strategy - SS #3: Increase in Positive Outcomes in Employment Status (continued)

(6) Other	Head(s) of work-able households engaged in other activities in FY 2024 is 0.	Expected head(s) of households participating in other activities, leading to positive outcomes in employment status after implementation of the activity is not expected to change.	<i>This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.</i>	<i>. The data collected during this reporting period was utilized in establishing a baseline.</i>
	Percentage of total work-able households engaged in other activities in FY 2024 is 0%.	Expected percentage of total work-able households participating in other activities, leading to positive outcomes in employment status after implementation of the activity is not expected to change.	This is the first year of reporting, and data was used to establish the baseline values for this metric. Outcome data will be provided beginning in FY 2025.	The data collected during this reporting period was utilized in establishing a baseline.

Activity 29: Moving On Strategy**SS #4: Households Removed from Temporary Assistance for Needy Families (TANF)**

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households receiving TANF assistance (decrease).	Households receiving TANF prior to implementation of the activity (number)	Expected number of households receiving TANF after implementation of the activity (number).	Actual households receiving TANF after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of Moving On Strategy households receiving TANF assistance.	Households eligible for Moving On Strategy (27) and receiving TANF prior to implementation of the activity is 1(3.7%).	The number of Moving On Strategy households receiving TANF is not expected to change as a result of this activity.	The number of households receiving TANF is 4 (15%).	The outcome does not meet the benchmark.

Activity 29: Moving On Strategy
SS #6: Reducing Per Unit Subsidy Costs for Participating Households

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Average subsidy per household affected by this policy prior to implementation of the activity (in dollars).	Expected average subsidy per household affected by this policy after implementation of the activity (in dollars).	Actual average subsidy per household affected by this policy after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars.	Average HAP subsidy per household affected by this policy prior to implementation of the activity is \$672.	The expected average HAP subsidy per Moving On Strategy households is not expected to change. May initially see an increase in subsidy costs overtime.	During the reporting period, the average HAP for the 26 Moving On households was \$1,336.	The outcome does not meet the benchmark. A trend of increasing subsidy costs may reflect the rising cost of rent in the housing market.

Activity 29: Moving On Strategy
SS #7: Increase in Tenant Rent Share

Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
PHA rental revenue in dollars (increase).	PHA rental revenue prior to implementation of the activity (in dollars).	Expected PHA rental revenue after implementation of the activity (in dollars).	Actual PHA rental revenue after implementation of the activity (in dollars).	Whether the outcome meets or exceeds the benchmark.
Average tenant rent share of Moving On Strategy households.	Average tenant rent share prior to implementation of the activity for households eligible for Moving on Strategy is \$490.	The average tenant rent share for Moving On Strategy households is not expected to change as a result of this activity.	During the reporting period, the average tenant rent share for the 26 Moving On households was \$383.	Yes, the outcome meets the benchmark for this metric.

Activity 29: Moving On Strategy SS #8: Households Transitioned to Self-Sufficiency				
Unit of Measurement	Baseline	Benchmark	Outcome	Benchmark Achieved?
Number of households transitioned to self-sufficiency (increase). The PHA may create one or more definitions for "self-sufficiency" to use for this metric. Each time the PHA uses this metric, the "Outcome" number should also be provided in Section (II) Operating Information in the space provided.	Households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) prior to implementation of the activity (number). This number may be zero.	Expected households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Actual households transitioned to self-sufficiency (<<PHA definition of self-sufficiency>>) after implementation of the activity (number).	Whether the outcome meets or exceeds the benchmark.
Number of Moving On Strategy households transitioned to self-sufficiency (increase). For purposes of this activity, "self-sufficiency" is defined as remaining housed through the Moving on Strategy, and not returning to homelessness.	Number of Moving On Strategy households transitioned to self-sufficiency prior to implementation of the activity in FY 2023 is 0.	Expected number of Moving On Strategy households transitioned to self-sufficiency as a result of this activity is 0.	Number of families that remained housed, not returning to homelessness is 26 (100%)	This outcome exceeds the benchmark.

iii. Actual Non-Significant Changes

None.

iv. Actual Changes to Metrics/Data Collection

None. v. Actual Significant Changes

None.

vi. Challenges in Achieving Benchmarks and Possible Strategies

None.

B. Not Yet Implemented Activities

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

C. On Hold Activities

Activity 3: Alternate Assessment Programs

i. Activity 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. Background, Actions Taken, Plans for Reactivation

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. 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.

D. Closed Out Activities

Activity 2: Strategic Investment Policies

i. Approval, Implementation, and Close-Out Years

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. Approval, Implementation, and Close-Out Years

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. Approval, Implementation, and Close-Out Years

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 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. Approval, Implementation, and Close-Out Years

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. Approval, Implementation, and Close-Out Years

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 following 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 because 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. Approval, Implementation, and Close-Out Years

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. Approval, Implementation, and Close-Out Years

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

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2011 MTW Annual Plan and implemented on July 1, 2012. This activity was closed through HACSB's FY 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 eligible program participants to receive the balance of their escrow account upon completion 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, which does not require voluntary termination of assistance as a condition of receiving their escrow account balance. HACSB plans to develop and propose a revised Local FSS MTW activity in the future and will incorporate lessons learned and best practices from this activity.

Activity 21: Utility Allowance Reform

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2012 Annual MTW Plan; it 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 – eliminated 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 we do not anticipate implementing a utility allowance MTW activity.

Activity 30: Valencia Grove Phase II, Affordable Rent Strategy

i. Approval, Implementation, and Close-Out Years

This activity was approved in our FY 2024 Annual MTW Plan and was never implemented. This activity is being closed through FY 2024 Annual MTW Report.

ii. Reason(s) for Close-Out

This activity permitted HACSB to approve higher contract rent for project-based voucher and tenant-based voucher units than for other affordable non-voucher units at Valencia Grove Phase II. While this property is still under construction with an anticipated completion Spring 2025, HACSB is currently in the process of converting this property through HUD’s Restore-Rebuild initiative, formally known as “Faircloth-to RAD”, therefore Activity 30 is no longer necessary.

V. Planned Application of MTW Funds

A. Sources and Uses of MTW Funds

i. Actual Sources of MTW Funds in the Plan Year

HACSB's unaudited and audited information regarding sources of MTW Funds is submitted through the Financial Assessment System – PHA (FASPHA).

ii. Actual Uses of MTW Funds

HACSB's unaudited and audited information regarding uses of MTW Funds is submitted through the Financial Assessment System – PHA (FASPHA).

iii. Actual Use of MTW Single Fund Flexibility

- HACSB's Family Empowerment Services department (FES) and its services, which are not a separate MTW activity, are funded using single fund flexibility.
- 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.
- 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.
- 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.
- Single-fund flexibility may be utilized to support expenses for RAD-converted developments, including, but not limited to, mandated reserve contributions.

- 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.
- HACSB utilizes single-fund flexibility to support the acquisition of rental housing properties, in conjunction with commitment of project-based vouchers to the site.
 - In FY 2024, HACSB acquired a 60-unit rental housing development, Northport Apartments, using single-fund flexibility. MTW funds supported approximately 48.2% of the cost. HACSB committed 29 PBV units to the site to support the remaining cost. The building is occupied, and all project-based vouchers (29) have been implemented within the FY.
- HACSB anticipates opening a community services 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 may use single-fund flexibility to support the development of the CRC, dependent on availability of funding.
- HACSB’s Activity 28: Leasing Success Strategies is funded through single-fund flexibility.

B. Local Asset Management Plan

i. Did the MTW PHA allocate costs within statute in the Plan Year?

No.

ii. Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

Yes.

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

No. The LAMP is unchanged from the document provided through this year's MTW Plan.

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

N/A. No changes were made to the LAMP and therefore a copy is not provided with this Report.

VI. Administrative

A. Reviews, Audits and Inspections

HACSB does not have open audits at this time.

B. Evaluation Results

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 summary of those evaluations.

1. **Term-Limited Lease Assistance Program (Activity 20):** The LLU longitudinal study of this initiative began in 2012. The study follows participating families through their progress from initial lease-up through their end of term, tracking their goals and accomplishments. Since FY 2017, HACSB has also worked with LLU to monitor the self-sufficiency related progress of families for up to two years after commencement of housing assistance through a voluntary post-assistance survey process. Evaluation reports have helped to identify areas of success and challenge within this activity, and HACSB has adapted policies and procedures, such as intake and goal-setting processes, in response to outcomes of the evaluation. This evaluation continued in FYE 2024, and the final evaluation report will be completed in early FYE 2025.
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 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. This evaluation was on hold during FYE 2024 but will resume in FYE 2025.
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. Each development includes on-site supportive services partners with whom we are working to assist with data collection (through surveys to residents). This evaluation continued in FYE 2024, with LLU concluding that supportive services offered at these sites were instrumental in keeping families housed.
4. **Moving On Strategy:** The Moving On Strategy was implemented in late 2023. A longitudinal study of this program will begin in FYE 2025 with a baseline report using initial data from the Moving On program. LLU will use HACSB data and data from the Department of Behavioral Health (DBH) to better understand the effects of the program. Specific research questions will focus on factors that influence a household's willingness to transition to the Moving On program, services provided to Moving On households, service gaps, and overall impacts to households.
5. **Other Activities:** Although not a MTW initiative, HACSB has collaborated with LLU for an evaluation of the Emergency Housing Voucher (EHV) program. The evaluation will attempt to answer two research questions: 1) what factors affect an individual or family's success in leasing through the EHV program? and, 2) which factors affect the individual or family's ability to remain stably housed through the EHV program? HACSB was allocated 455 Emergency Housing Vouchers in 2021 and began accepting referrals for this new national program on October 4, 2021. The program was fully utilized before the September 30, 2023, leasing deadline. Using de-identified data provided by HACSB for the first group of customers

served through this program, including information from the housing navigation service provider, LLU provided a preliminary report addressing the first research question. LLU identified several common barriers to leasing with EHV assistance, including tenant preference, difficulty maintaining contact with referred customers, financial barriers, physical limitations, and legal barriers. With the program now fully utilized, LLU will conduct an expanded evaluation of this program focusing on factors affecting the housing stability of EHV households. This evaluation will continue in FYE 2025.

C. MTW Statutory Requirement Certification

HACSB certifies that it has met the three statutory requirements of:

1. Assuring that at least 75 percent of the families assisted by the Agency are very low-income families;
2. Continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and
3. Maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

D. MTW Energy Performance Contract (EPC) Flexibility Data

Not Applicable.

Appendices

Appendix A. List of Existing MTW Project-Based Vouchers

Property Name	Number of Project-Based Vouchers		Status at End of Plan Year	RAD?	Description of Project	City
	Planned	Actual				
Andalusia	17	17	Leased/Issued	No	Supportive Housing Units	Victorville
Arrowhead Grove Phase I - Valencia Vista	75	75	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Arrowhead Grove Phase II - Olive Meadow	61	61	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Arrowhead Grove Phase III - Crestview Terrace	116	116	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Arrowhead Grove Phase IV	92	92	Committed	R-R	Currently in Development	San Bernardino
Arrowhead Woods	51	51	Leased/Issued	No	Affordable Senior Community	San Bernardino
Barstow - 7th Street	74	74	Leased/Issued	Yes	Affordable Family Community	Barstow
Barstow - Bighorn	70	70	Leased/Issued	Yes	Affordable Family Community	Barstow
Barstow - Deseret	15	15	Leased/Issued	Yes	Affordable Family Community	Barstow
Barstow - Williams	40	40	Leased/Issued	Yes	Affordable Senior Community	Barstow
Barstow - Yosemite	18	18	Leased/Issued	Yes	Affordable Family Community	Barstow
Bloomington Phase I	11	11	Leased/Issued	No	Affordable Family & Senior Community	Bloomington
Bloomington Phase II	20	20	Leased/Issued	No	Affordable Family Community	Bloomington
Bloomington Phase III	20	20	Leased/Issued	No	Supportive Housing for Chronically Homeless	Bloomington
Chino - Monte Vista	50	50	Leased/Issued	Yes	Affordable Family Community	Chino
Colton - Parkview Pines	85	85	Leased/Issued	Yes	Affordable Family Community	Colton
Colton - Mt. Vernon Manor	39	39	Leased/Issued	Yes	Affordable Senior Community	Colton
Day Creek Villas	8	8	Leased/Issued	No	Affordable Senior Community	Rancho Cucamonga
Desert Haven Apartments	31	31	Leased/Issued	No	Supportive Housing for Chronically Homeless	Victorville
Desert Village	46	46	Leased/Issued	No	Affordable Senior Community	Victorville
Golden Apartments	38	38	Leased/Issued	No	Supportive Housing for Chronically Homeless	San Bernardino
Grandview Towers	40	40	Leased/Issued	No	Affordable Senior Community	Twin Peaks

Highland - 9th Street	12	12	Leased/Issued	Yes	Affordable Family Community	Highland
Horizons at Yucaipa	50	50	Leased/Issued	No	Senior Community with Supportive Housing Units	Yucaipa
Housing Partners I Scattered Site Units	64	64	Leased/Issued	No	Affordable Family Communities	Various
Ivy at College Park	8	8	Leased/Issued	No	Affordable Family Community	Chino
Las Terrazas	9	9	Leased/Issued	No	Supportive Housing for Chronically Homeless	Colton
Los Olivos	98	98	Leased/Issued	Yes	Affordable Family Community	Upland
Maplewood Homes	296	296	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Maplewood Scattered Sites	34	34	Leased/Issued	Yes	Affordable Family Communities	San Bernardino
Meadowbrook	47	47	Leased/Issued	No	Affordable Senior Community	San Bernardino
Mentone Clusters	33	33	Leased/Issued	No	Affordable Family Community	Mentone
Metro View (formerly Rialto Metrolink)	8	8	Leased/Issued	No	Affordable Family Community	Rialto
NCLU - Scattered Sites	40	40	Leased/Issued	No	Supportive Housing for Homeless Families	Various
Northgate Village	12	12	Leased/Issued	No	Veteran Housing Units	Victorville
Redlands - Brockton	75	75	Leased/Issued	Yes	Affordable Family Community	Redlands
Redwood Terrace	68	68	Leased/Issued	No	Affordable Senior Community	Fontana
Robert O. Townsend	48	48	Leased/Issued	No	Affordable Senior Community	Montclair
Rosena Fountains	8	8	Leased/Issued	No	Affordable Family Community	Fontana
Scattered Sites Affordable Portfolio LLC	236	236	Leased/Issued	No	Affordable Family Communities	Various
Sunrise Vista	79	79	Leased/Issued	No	Affordable Family Community	Barstow
Sunset Pointe	70	70	Leased/Issued	No	Affordable Family Community	Barstow
Valencia Grove Phase I	85	85	Leased/Issued	No	Affordable Family Community	Redlands
Valencia Grove Phase II	8	8	Committed	No	Currently in Development	Redlands
Vista del Sol	53	53	Leased/Issued	No	Affordable Senior Community	Redlands
Waterman Scattered Sites	97	97	Leased/Issued	Yes	Affordable Family Communities	San Bernardino
Yucaipa Crest	45	45	Leased/Issued	No	Affordable Senior Community	Yucaipa
Total	2600	2600				

Appendix B. Non-MTW Information

Special Purpose Programs

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

PROGRAM TITLE	POPULATION SERVED	FAMILIES SERVED <i>AS OF FYE 2024</i>
Mainstream Vouchers	This program serves non-elderly persons with disabilities and is administered using the same rules as other voucher programs. HACSB has partnered with Knowledge and Education for Your Success (KEYS), the San Bernardino County Department of Behavioral Health (DBH), Inland Empire Health Plan (IEHP), Inland Regional Center, and Rolling Start for referral of customers and supportive services such as case management and housing navigation. (Note: Participants of the Mainstream 5 program transitioned to the Mainstream 811 program. The combined program is now known simply as "Mainstream Vouchers.")	310
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.	71
Veteran's Affairs Supportive Housing (VASH)	HACSB and Veterans Administration Medical Center partner to provide tenant-based and project-based vouchers and supportive services to eligible homeless veterans and their families. The program goals include promoting veteran recovery and independence to sustain permanent housing	452
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.	8
Emergency Housing Vouchers	In 2021, HACSB was awarded 455 tenant-based vouchers to assist families experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or who were recently	434

	experiencing homelessness. Families were referred through the Coordinated Entry System, voucher issuance sunset 9/30/23, and voucher funding will end 9/30/2030.	
Family Unification Program	HACSB partners with Department of Children and Family Services to provide tenant-based vouchers to families whose lack of adequate housing is a primary barrier for children to be returned from out of home placement or to prevent out of home placement. The program also serves youth exiting the foster care system who are at risk of homelessness or former foster youth who are homeless between the ages of 18 and 24.	117

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 <i>AS OF FYE 2024</i>
Laurelbrook Estates	This program assists individuals or families experiencing disabling conditions and homelessness 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.	25
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 our homeless community.	12
Cornerstone	Effective October 1, 2022, four tenant-based programs (Whispering Pines, Stepping Stones, New Horizons, and Cornerstone) consolidated into one tenant-based program called Cornerstone. The consolidated program 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). HACSB provides the housing services based on eligible referrals from the CES and DBH, of which DBH matches housing funds by providing supportive services.	194

Lantern Woods	This program 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 Department of Behavioral Health for homeless individuals and families.	15
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HACSB College Scholarship Program

Since 1991, the Housing Authority has been proud to assist eligible participants in achieving their educational goals through scholarships. To date, HACSB has awarded 355 students with \$283,000 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.

Knowledge & Education for Your Success (KEYS)

Founded in 2009 by the Housing Authority of the County of San Bernardino (HACSB), Knowledge and Education for Your Success (KEYS) is a 501(c)(3) nonprofit organization, private-public partnership, dedicated to enhancing access to supportive services for low-income residents experiencing homelessness in San Bernardino County. Since its inception, KEYS has been committed to a community in which individuals and families lead meaningful and empowered lives breaking generational barriers.

KEYS administers various grant-based rapid-rehousing, supportive services, and financial assistance programs. Since 2014, across all its programs, KEYS has served 3,885 households (12,781 individuals) and has placed 2,534 households in housing (8,732 individuals). Outcomes from these programs for the most recent grant year are shown in the following table.

PROGRAM NAME	HOUSEHOLDS SERVED	HOUSEHOLDS HOUSED
Supportive Services for Veteran Families*	128	41
Housing Support Program	497	212
Continuum of Care (Keys for Life/Keys for Success)	174	43

* A former KEYS program

Other Affordable Rental Housing

Affiliate Non-Profit – Housing Partners I, Inc. (HPI, Inc.) was created in 1991 to assist in the development of 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 set-aside Home Investment Partnerships Program (HOME) funds from San Bernardino County's 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. Through the leveraging of HPI, a large number of affordable housing units have been created, owned and operated in the County. These units are shown in the following table.

Affiliate Non-Profit			
PROPERTY NAME	CITY	UNITS	ENTITY
Scattered Sites – Region 1	Loma Linda, Redlands, Yucaipa, Bloomington, Colton, Fontana, Rancho Cucamonga	97	HPI, Inc. Portfolio
Scattered Sites – Region 2	Ontario, Montclair, Chino	107	HPI, Inc. Portfolio
Scattered Sites – Region 3	Adelanto, Apple Valley, Hesperia, Victorville, Joshua Tree, 29 Palms, Yucca Valley	131	HPI, Inc. Portfolio
Acacia Property	Fontana	28	HPI Property Acquisition LLC
Desert Village	Victorville	46	HPI Property Acquisition LLC
Kendall Drive Apts.	San Bernardino	37	HPI Property Acquisition LLC
Robert Townsend	Montclair	48	HPI Property Acquisition LLC
Kendall Park Apts.	San Bernardino	52	HPI Property Acquisition LLC

In addition to these properties HPI has ownership interests in multiple affordable housing developments across San Bernardino County, partnering with a number of affordable housing developers to bring additional housing to the region.

Appendix C. 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 and Alternative Flat Rents	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 Inclusions	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	Implemented
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
25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017 Amendment 1	Implemented
27	Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents	Expanding Housing Opportunities	FY 2019 Amendment 2	Implemented

28	Leasing Success Strategies	Expanding Housing Opportunities	FY 2022 Amendment 1	Implemented
29	Moving On Strategy	Expanding Housing Opportunities	FY 2023	Implemented
30	Valencia Grove Phase II, Affordable Rent Strategy	Expanding Housing Opportunities	FY 2024	Closed Out