

# MOVING TO WORK

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Housing Authority of the  
County of San Bernardino  
Building Opportunities Together

## REPORT

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County of San Bernardino  
Building Opportunities Together



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# Our Mission

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



# Our Vision

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



# Our Core Values

## *Respect*

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

## *Safety*

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

## *Integrity*

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

## *Service*

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

## *Innovation*

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

# HACSB Leadership Team



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# I. Introduction

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## Who We Are

As the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 27,500 people, most of whom are seniors, individuals with disabilities, veterans, and children. Our core work is to provide rental assistance to prevent homelessness among low-income households. 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 HACSB's fiscal year ending (FYE) 2025, more than 11,300 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 nearly twice the minimum wage to afford a median-priced one-bedroom apartment.

Attaining stable housing is only one step on the path to self-sufficiency. HACSB builds strong partnerships within San Bernardino County to help support our customers' needs beyond housing. The services and opportunities our partnerships bring create meaningful differences in the lives of families we serve, maximizing our resources and impact by mobilizing the talents of our community partners.

We also assist households to move from renting to purchasing a home through our Homeownership Program, and, along with many partners, we help individuals who were formerly homeless achieve stability through two Permanent Supportive Housing communities and special purpose voucher programs such as the Veterans Affairs Supportive Housing (VASH) and Emergency Housing Voucher (EHV) programs.

HACSB also owns and manages a large portfolio of affordable rental communities that are not federally funded. These properties are typically leased at amounts below market rents, bringing additional affordable housing opportunities to our communities in addition to the traditional rental assistance programs we administer.

## 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 MTW demonstration provides policy and regulatory flexibility to housing agencies to design and test affordable housing strategies and related policies. The MTW designation does not provide any additional funding. 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 influence national housing policy to improve housing programs and services for all families.

HACSB was designated by Congress as a MTW agency in 2008. Since receiving the MTW designation, we have developed and received approval for 30 MTW activities. Although the MTW designation does not provide additional funding for our agency, modifications to administrative processes using MTW flexibilities have resulted in modest staff time and cost savings that have helped us weather ongoing funding cuts and rising costs. 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 use of MTW flexibilities during HACSB's fiscal year. Information is organized into the following sections following the format required by the U.S. Department of Housing and Urban Development (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 #1 – Single Fund Budget.
- *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 developed with input from our team, Board of Commissioners, partners, and program participants/residents. The Aspirational Statements reflect the strategic direction of the agency and align with the statutory objectives of the MTW designation. The flexibility provided through the MTW designation supports our long-term goals.

HACSB's Aspirational Statements are:

Aspirational Statement  
#1

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.

Aspirational Statement  
#2

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

Aspirational Statement  
#3

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

Aspirational Statement  
#4

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

Aspirational Statement  
#5

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

# 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.

**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.

**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:

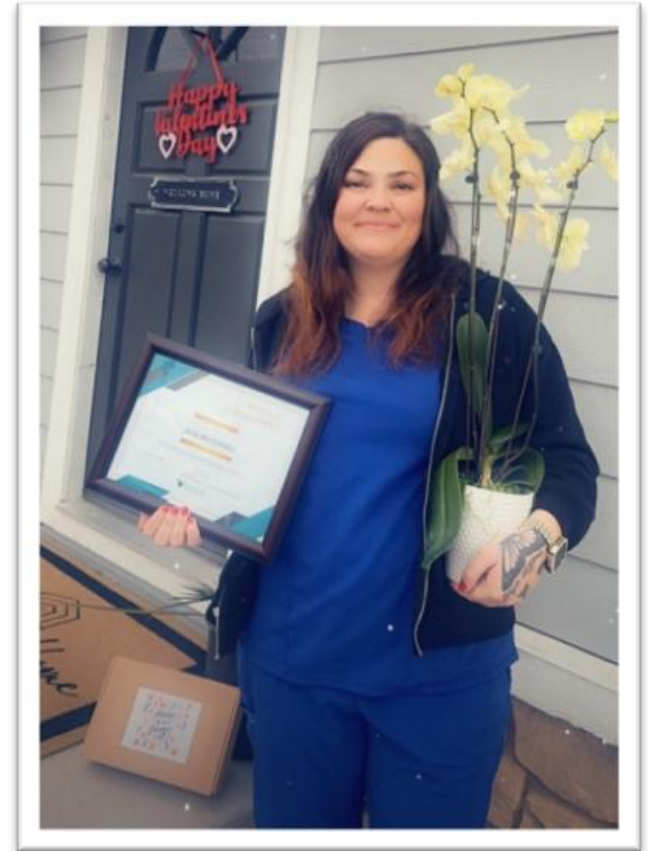
- Create a Road Map for real estate redevelopment.
- Develop and implement an internal Repair and Replacement plan that assesses and prioritizes the needs of all properties and establish a finance plan to fund these needs.
- Ensure that leasing efforts align with voucher/funding utilization for all rental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

## Participant Impact Story

The impact of our programs is best illustrated through the experiences of our participants. Their achievements are the reason to develop efficient programs, provide paths to self-sufficiency, and improve access to opportunity through housing choice.

In 2019, Ms. C joined HACSB's Term-Limited Lease Assistance (TLA) program. TLA provides up to five years of tenant-based Housing Choice Voucher (HCV) rental assistance coupled with coaching and resource referral services provided through HACSB's Family Empowerment Services team. TLA participants may be approved for an extension of assistance for up to two years to complete self-sufficiency related goals such as completing an educational program or purchasing a home.

As a single mother of three relying on government assistance as her sole source of income, Ms. C was determined to create new opportunities for herself and her children. With the support of the HACSB team, she set ambitious goals, one of which was to become a homeowner. Through the TLA program, she accessed resources to help her improve her credit score and secure employment. She also diligently saved for a down payment on a home. Through her hard work and determination, Ms. C achieved her goals and is now a proud homeowner. Her family is thriving in their new home, and Ms. C is working full time and actively supporting her children's education. Reflecting on her journey, she expressed gratitude for the guidance and resources that helped her grow. "Living in my new home makes me feel like I can accomplish anything," she said. Ms. C's story is a testament to the positive impacts of support, determination, and hard work in transforming lives. We celebrate her success!



# II. General Operating Information

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

# 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			
Valencia Grove Phase II	103	0	Committed	Yes	Restore-Rebuild, New Construction
<b>TOTAL</b>	<b>103</b>	<b>0</b>			

### Description of differences between the Planned and Actual Existing Number of Vouchers Newly Project-Based:

The Restore-Rebuild transition of the Valencia Grove Phase II community (and placement of new Restore-Rebuild vouchers) was originally projected to take place near the end of HACSB’s FYE 2025. However, various delays in the construction and the government shutdown have slowed progress and extended that timeline into our FYE 2026.

The Restore-Rebuild application for Valencia Grove Phase II was under review by HUD when the government shutdown began on October 1, 2025. The project was granted authorization from HUD for the review process to continue while the shutdown was in effect due to the potential threat to the protection of the property, and we continued working with the HUD team throughout the shutdown. HUD granted their approval for the development proposal on November 14, 2025.

Originally the site of HACSB’s first Public Housing community, the former Redlands-Lugonia Public Housing site is undergoing phased redevelopment. The site originally consisted of 115 Public Housing units. When planned redevelopment is complete, the Valencia Grove community will include 238 newly constructed affordable multifamily homes and single-family homes. Phase I of redevelopment was completed in 2016 and includes 85 multifamily units for lease to low-income households (households with income at or below 80% of the Area Median Income). Construction of Phase II began in early 2023 and is expected to be completed in late 2025. This phase includes 103 additional multifamily units for lease to low-income households and one manager’s unit. The planned third and final phase of redevelopment site will consist of the construction of 39 detached single-family homes for sale to buyers at or below 120% of the Area Median Income (AMI). Uncertain economic conditions, including rising interest rates and development costs, have delayed implementation of the third phase. HACSB is evaluating financing options and continuing solicitation of a fee developer to support Phase III of redevelopment. Groundbreaking of this phase is optimistically projected for the end of CY 2026.

## ii. Actual Existing Project-Based Vouchers

See Appendix A. for list of current project-based vouchers.

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

None.

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

HACSB successfully secured all financing to begin the construction of the fourth phase of redevelopment at Arrowhead Grove in San Bernardino. In partnership with its developer partner, National Community Renaissance (National CORE), HACSB secured funds from several funding sources including Low-Income Housing Tax Credits (LIHTC), funding from the California Office of Housing and Community Development, debt from our lender Capital One, and HOME Funds from both the City of San Bernardino and San Bernardino County. Construction closing was completed in October 2025 and groundbreaking took place on November 4, 2025. This fourth phase will increase the total unit count to 412, compared to the original 252 public housing units on the site.

HACSB previously converted its entire Public Housing portfolio (except for a single unit) to the Project-Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program. HACSB will continue to use the reserves established via this conversion to perform annual physical needs work at the properties.

HACSB's major Public Housing redevelopment efforts continue in Redlands (AMP 150, sites 19-01, 8, and 9), where Phase II of our Valencia Grove redevelopment project will add 104 units of affordable housing to the site to complement the 85 Phase 1 units completed in 2016. Construction of Phase II commenced in January 2023 and will be completed in late 2025. The project was originally funded by utilizing an innovative financing structure, including a variable rate taxable bond issue leveraged with HACSB and Housing Partners I, Inc. (HPI) equity secured through the refinancing of various portfolio properties. We are now working to implement permanent financing for the project which will include the use of HACSB's A+ bond rating to provide general obligation bonds to the project as well as two HPI loans, an HACSB ground lease loan, and a HACSB loan.

## 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	
	<i>PLANNED</i>	<i>ACTUAL</i>	<i>PLANNED</i>	<i>ACTUAL</i>
MTW Public Housing Units Leased	12	12	1	1
MTW Housing Choice Vouchers (HCV) Utilized	115,056	115,296	9,588	9,608
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
<b>ACTUAL TOTAL HOUSEHOLDS SERVED</b>	<b>115,068</b>	<b>115,305</b>	<b>9,589</b>	<b>9,609</b>

#### Description of Differences between the Planned and Actual Households Served

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 2025, including those who were served for only a portion of the year. Although not a substantial difference from what was planned, program attrition was less than anticipated.

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
<b>TOTAL</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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) 2025 with a 96.5% leasing rate. As Housing Assistance Payment (HAP) expenses continue to outpace 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. In FY 2025, HACSB implemented a 36% rent tier calculation for career-able households, as approved by HUD through HACSB's FY 2018 MTW Annual Plan, to help prevent a funding shortfall. Additional measures leveraging MTW flexibilities will be implemented in FY 2026.
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	88,652	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher – Project-Based	Centrally managed, site/region-specific, by bedroom size	75,858	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher – Tenant-Based	Community-wide	25,490	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 80,559 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	In FY 2025, HACSB established a waitlist preference for Emergency Housing Voucher (EHV) households for PBV and RAD-PBV sites due to the upcoming sunset of the EHV program.

## 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
<b>TOTAL LOCAL, NON-TRADITIONAL HOUSEHOLDS ADMITTED</b>	<b>0</b>

### 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
<b>1 Person</b>	442	2,801	-	3,243	34.7%
<b>2 Person</b>	338	1,619	-	1,957	20.9%
<b>3 Person</b>	279	1,187	-	1,466	15.7%
<b>4 Person</b>	222	1,003	-	1,225	13.1%
<b>5 Person</b>	142	567	-	709	7.6%
<b>6+ Person</b>	183	569	-	752	8.0%
<b>TOTAL</b>	<b>1,606</b>	<b>7,746</b>	-	<b>9,352</b>	<b>100%</b>

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

<b>MIX OF FAMILY SIZES SERVED (IN PLAN YEAR)</b>				
<b>FAMILY SIZE</b>	<b>BASELINE MIX PERCENTAGE</b>	<b>NUMBER OF HOUSEHOLDS SERVED IN PLAN YEAR</b>	<b>PERCENTAGE OF HOUSEHOLDS SERVED IN PLAN YEAR</b>	<b>PERCENTAGE CHANGE FROM BASELINE YEAR TO CURRENT PLAN YEAR</b>
<b>1 Person</b>	34.7%	4,043	40.1%	15.6%
<b>2 Person</b>	20.9%	2,018	20%	-4.3%
<b>3 Person</b>	15.7%	1,571	15.6%	-0.6%
<b>4 Person</b>	13.1%	1,036	10.3%	-21.4%
<b>5 Person</b>	7.6%	747	7.4%	-2.6%
<b>6+ Person</b>	8.0%	656	3.4%	-57.5%
<b>TOTAL</b>	<b>100%</b>	<b>10,071</b>	<b>100%</b>	

**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. This is the eighth consecutive year the distribution of families by size in the populations remained very similar throughout the reporting year, 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.. 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 end of participation;
- Total household income from other forms of government assistance (TANF, cash aid, etc.) of \$0 when assistance ends.

In 2025, a total of 13 families transitioned to self-sufficiency through our activities. This is a decrease from last year, partially attributed to the exclusion of some activities that were previously included. Some families voluntarily leave the program despite not meeting 80% AMI income threshold or other self-sufficiency definition, so these exits are not counted toward self-sufficiency outcomes. 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.

<b>MTW ACTIVITY NAME/NUMBER</b>	<b>NUMBER OF HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY</b>	<b>MTW PHA LOCAL DEFINITION OF SELF-SUFFICIENCY</b>
10 – Minimum Rent	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.
20 – Term-Limited Lease Assistance Program	12	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.
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	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.
<b>HOUSEHOLDS DUPLICATED ACROSS MTW ACTIVITIES</b>	<b>0</b>	
<b>TOTAL (UNDUPLICATED) HOUSEHOLDS TRANSITIONED TO SELF-SUFFICIENCY</b>	<b>13</b>	

Activity 10, HACSB's Local Minimum Rent activity, did not result in any transitions to self-sufficiency this year. 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 households as of September 30, 2025, of which 12 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.

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

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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

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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 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.

<b>Activity 4: Biennial Recertifications Agency Cost Savings<sup>1</sup></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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	\$152,141  \$144,545 staff cost + \$7,596 postage cost  Staff Cost Calculation: 3,444 hours X \$41.97 per hour. The hourly rate has been updated for this report to reflect the current loaded labor rate.	Yes, the outcome meets the benchmark for this metric.

<sup>1</sup> 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.

<b>Activity 4: Biennial Recertifications Staff Time Savings<sup>2</sup></b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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	3,444 total hours.  Staff Time Calculation: 3,021 recertifications performed in PH and HCV programs x 1.14 hours per recertification.	Yes, the outcome meets the benchmark for this metric.

### iii. Actual Non-Significant Changes

None.

### iv. Actual Significant Changes

None.

<sup>2</sup> 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 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.

<b>Activity 5: Simplified Income Determination Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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"> <li>• of income verification process</li> <li>• to collect and calculate asset income for both PH and HCV</li> <li>• of staff time spent to process EID</li> </ul>	\$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.	\$100,560  Staff Cost Calculation: 2,396 hours X \$41.97 staff cost per hour. The hourly rate has been updated for this report to reflect the current loaded labor rate.	Yes, the outcome meets the benchmark for this metric.

**Activity 5: Simplified Income Determination  
Staff Time Savings**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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	2,396 total hours.	Yes, the outcome meets and the benchmark for this metric.

<b>Activity 5: Simplified Income Determination Decrease in Error Rate of Task Execution</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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"> <li>• completing verifications</li> <li>• calculating assets</li> <li>• processing the earned income disallowance</li> </ul>	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 8%.	Yes, the outcome meets and exceeds the benchmark for this metric.

### iii. Actual Non-Significant Changes

None.

### iv. Actual Significant Changes

None.

## Activity 8: Local Policies for Portability

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

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

### ii. Description/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.

<b>Activity 8: Local Policies for Portability Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.	<p>\$70,060 in FY 2009</p> <p>Staff cost calculation: 2,004 hours X \$34.96 average staff cost per hour</p>	\$35,029 in FY 2015 and beyond.	<p>\$13,137</p> <p>Staff Cost Calculation: 313 hours X \$41.97 average staff cost per hour. The hourly rate has been updated for this report to reflect the current loaded labor rate.</p>	Yes, the outcome meets the benchmark for this metric.

**Activity 8: Local Policies for Portability  
Staff Time Savings**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.	313 hours.  Staff Time Calculation: 1.97 hours per port-in x 159 port-ins.	Yes, the outcome meets the benchmark for this metric.

**iii. Actual Non-Significant Changes**

None.

**iv. Actual Significant Changes**

None.

## Activity 10: Minimum Rent

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

- FY 2009: Initial approval. The activity was implemented on October 1, 2009, for recertifications of currently served 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.
- FY 2025:
  - A significant modification was made through FY 2025 MTW Annual Plan, Amendment 1, to increase the minimum rent from \$125 to \$450 for most MTW households.

### 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 to \$125 from the current regulatory maximum of \$50 per month for all households in both the Public Housing and Housing Choice Voucher Programs. The activity applies to MTW households.

Through HACSB's FY 2025 MTW Plan, Amendment 1, HACSB received approval to increase the minimum rent from \$125 to \$450 for most MTW households. The new increased minimum rent was calculated as 36% of gross monthly income for a household with one member earning California's current minimum wage (\$16/hour) and working 18 hours/week.

This change will apply to current and new:

- Career-able households (as defined in HACSB's Administrative Plan and ACOP and Term-Limited Lease Assistance Program participants); and
- Elderly/disabled households (as defined in HACSB's Administrative Plan and ACOP) with one or more career-able household members.

This change will not apply to certain vulnerable populations. For these populations, the minimum rent will remain at \$125. Such populations include:

- Elderly/disabled households with no career-able household members; and
- Households participating in HACSB's MTW Activity #23, No Child Left Unsheltered (NCLU); and
- Households participating in HACSB's MTW Activity #29, Moving On Strategy; and
- Other populations/programs (current and future) identified in HACSB's Administrative Plan and Admissions and Continued Occupancy Policy (ACOP) documents as having a fixed \$125 minimum rent; and
- Other populations/programs for whom the HACSB MTW minimum rent is waived/postponed as specified in HACSB's Administrative Plan and Admissions and Continued Occupancy Policy (ACOP) documents.

As of FYE 2025, the new minimum rent has not been implemented. HACSB is in the process of developing an implementation timeline and process plan to apply the updated minimum rent. This includes coordinating with our software vendor for modifications to apply the new minimum rent. We anticipate the minimum rent will be implemented in the coming year.

HACSB recognizes that increasing the minimum rent will present a financial challenge for currently assisted households paying the current minimum rent of \$125. To provide time for current minimum rent households to adjust to the increased minimum rent, their tenant rent portion will be increased in tiers over time at regularly scheduled recertifications.

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.

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- In FY 2025, 286 households participated in the Minimum Rent activity.

<b>Activity 10: Minimum Rent Increase in Tenant Rent Share</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 \$180.	Yes, the outcome meets the benchmark for this metric.

<b>Activity 10: Minimum Rent Number of Participants with Flexibility to Reduced or Postponed Minimum Rent</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 (62 units out of 69 total PSH units).	The number of PSH minimum rent participants with reduced or postponed minimum rent is 8 (2.8%).	Yes, the outcome meets the benchmark for this metric.

<b>Activity 10: Minimum Rent Households Transitioned to Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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).	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 2025 is 0.	Yes, the outcome meets the benchmark for this metric.

**iii. Actual Non-Significant Changes**

None.

**iv. Actual Significant Changes**

In FY 2025, HACSB modified this activity through the FY 2025 MTW Annual Plan, Amendment 1, increasing the minimum rent from \$125 to \$450 for most MTW households. HACSB received approval from HUD for these modifications on June 4, 2025. Implementation of these changes will occur in FY 2026.

## 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 2018. 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 Housing Quality Standards (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:

- 1) Up to 100% percent of units in any development may be project-based;
- 2) Up to 30% of HACSB's MTW baseline number of units may be converted to PBV
  - a) When determining whether HACSB has reached this 30% limit, RAD-PBV units are included in the calculation.;

- 3) PBV will be allocated to all public housing units approved for disposition other than 27 units to be rehabilitated in conjunction with the San Bernardino County Department of Behavioral Health (308 PBV units);
- 4) Households residing in PBV units will not have automatic priority to receive tenant-based vouchers after one year, but instead will have such priority after two years;
- 5) 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;
- 6) 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;
- 7) 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;
- 8) 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 payment standard for the household for the initial term of the lease.
- 9) 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.
  - a) 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.
  - b) 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.
- 10) The rents for RAD units will equal the maximum specified under the RAD Notice. This component does not apply to the third 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.
- 11) 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:

- a) Shared housing (up to one person per bedroom);
  - b) Units on the grounds of a penal, reformatory, medical, mental health, or similar public or private institution;
  - c) Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care;
  - d) Manufactured homes;
  - e) Transitional housing;
  - f) Single-room occupancy;
  - g) Congregate housing;
  - h) Other housing types as needed.
- 12) 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.
- a) 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 allow mobility (provide a tenant-based voucher for the tenant to relocate) 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 exercise mobility.
- 13) 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 helps ensure access to housing for some of our most vulnerable populations, such as No Child Left Unsheltered (NCLU) customers. Allowing HACSB to keep units under PBV contract preserves 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.
- 14) HACSB may allow alternative occupancy standards for certain project-based units to be occupied using an alternative occupancy standard of up to two persons per bedroom. This flexibility allows 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.) 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. 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 flexibility will be utilized to prevent the following:

- a) Under-utilization of project-based vouchers in certain circumstances; and
- b) Loss of assistance for some Emergency Housing Voucher (EHV) households due to the program's end of funding.

- 15) As part of our participation in the U.S. Department of Housing and Urban Development's (HUD) Moving to Work (MTW) demonstration program, our agency has adopted the Fifth Amendment to the Standard MTW Agreement (executed in September 2020) and the authorizations of Attachment C. This amendment clarifies and confirms that MTW agencies are permitted to waive the federal requirement to use an independent entity when conducting inspections of Public Housing Agency (PHA) owned or managed properties. Under this waiver, HACSB may conduct Housing Quality Standards (HQS) inspections of PHA-owned units without the use of a third-party (independent) inspector. This change is authorized under Section 8(o)(11) of the U.S. Housing Act of 1937 and corresponding federal regulations. The waiver also applies to related independent-entity requirements, including determining rent reasonableness and assisting families in negotiating rent with the PHA when it is the property owner. This flexibility helps streamline operations and reduce administrative burden, while maintaining compliance with all applicable federal requirements, including subsidy layering reviews. HACSB remains committed to ensuring that all units meet federal housing quality standards and that families reside in safe, decent and sanitary housing.
- 16) For RAD Developments, HACSB will cap the Housing Assistance Payment (HAP) so as not to exceed the established RAD subsidy incremental funding for the transaction. In no case shall the total HAP exceed the RAD rent amount authorized under the applicable RAD Conversion Commitment (RCC) and HAP contract. This cap ensures alignment with RAD program requirements and maintains fiscal responsibility within funding allocation.
- 17) In June 2025, HACSB created a PBV wait list preference for households currently participating in HACSB's Emergency Housing Voucher (EHV) program. This waitlist preference was created in response to the U.S. Department of Housing and Urban Development's (HUD) notice of early termination of the EHV program due to lack of funding. The EHV program was scheduled to sunset in FY 2030 but funds are projected to be exhausted earlier, potentially during 2026. The PBV wait list preference will allow some EHV customers to voluntarily transition from EHV assistance to PBV assistance, ideally prior to the end of the EHV program. HACSB recognizes that EHV households are extremely vulnerable, and our intention is to prevent a return to homelessness for as many EHV customers as possible through this preference.

#### **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.

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

None.

### **iv. Actual Significant Changes**

None.

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

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

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

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

Payment standard increases will be applied to recertifications that are completed after the effective date of the latest Local Payment Standard schedule. However, an increase to the Local Payment Standards will not be automatically applied at recertification if the participant has leased a unit that is larger than their approved voucher subsidy size (“over-housed” participants). Increases to the Local Payment Standards will apply to over-housed participants during an interim or recertification only if a rent increase is requested by the landlord and approved in accordance with HACSB’s rent reasonableness policies.

HACSB established an exception payment standard for disabled households with an approved reasonable accommodation. This applies to households in programs that utilize the Local Payment Standards (LPS), including Veterans Assistance Supportive Housing (VASH) households. For these households, the exception payment standard would be the greater of 140% of the FMR or 140% of the LPS. For non-VASH households, the proposed exception payment standard would be the greater of either 120% of the Fair Market Rent (FMR) or 120% of the LPS.

### 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.

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<b>Activity 12: Local Payment Standards Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 2,551.	Yes, the outcome meets the benchmark for this activity.

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

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 \$1,407	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**  
**Households Able to Move from Areas of Poverty and/or Minority Concentration**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 17.2% total decrease:  Submarket 2: 20.6% (a 4.4% decrease from the Baseline of 25%)  Submarket 6: 8.2% (a 12.8% decrease from the Baseline of 21%)	Yes, the outcome meets the benchmark for this activity.

### iii. Actual Non-Significant Changes

None.

### iv. Actual Significant Changes

None.

## Activity 13: Local Inspection Policies

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

- FY 2010: Initial approval. Implemented on May 1, 2011.
- FY 2015: Modified to expand biennial inspections to all MTW units.
- FY 2016 and FY 2017: 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.

As part of our participation in the MTW demonstration program, our agency has adopted the Fifth Amendment to the Standard MTW Agreement (executed in September 2020) and the authorizations of Attachment C. This amendment clarifies and confirms that MTW agencies are permitted to waive the federal requirement to use an independent entity when conducting inspections of Public Housing Agency (PHA) owned or managed properties. Under this waiver, HACSB may conduct Housing Quality Standards (HQS) inspections of PHA-owned units without the use of a third-party (independent) inspector. This change is authorized under Section 8(o)(11) of the U.S. Housing Act of 1937 and corresponding federal regulations. The waiver also applies to related independent-entity requirements, including determining rent reasonableness and assisting families in negotiating rent

with the PHA when it is the property owner. This flexibility helps streamline operations and reduce administrative burden, while maintaining compliance with all applicable federal requirements, including subsidy layering reviews. HACSB remains committed to ensuring that all units meet federal housing quality standards and that families reside in safe, decent and sanitary housing.

### 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.

<b>Activity 13: Local Inspection Policies</b>				
<b>Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total annual cost to conduct inspections	Total expenses for inspections is \$707,551	Total expenses for inspections is \$579,392 in two years	\$443,615  Calculation of Cost: \$3,463 Staff cost +\$440,152 Contract costs	Yes, the outcome meets the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Significant Changes

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 Significant Changes

None.

## Activity 18: Property Management Innovation

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

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

### ii. Description/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 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.

**FY 2025 MTW Report Program Outcomes**

<b>Activity 18: Property Management Innovation Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.

<b>Activity 18: Property Management Innovation Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 2025.	Yes, the outcome exceeds the benchmark for this metric.

**iii. Actual Non-Significant Changes**

None.

iv. Actual Significant Changes

None.

## Activity 20: Term-Limited Lease Assistance

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

- FY 2011: Initial approval. Implemented 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 units. Currently assisted families who have applied for and are selected from the HCV wait list during their term of participation in the TLA 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 for that household 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. In 2024, the longitudinal study report included more than 1,531 households and reported positive outcomes, including:

- 38% increase in annual income between new households on the program and households that have been in the program for 5 years.
- By the final year of the program, less than 27% of households receive TANF support and no household receives general assistance support.
- Unemployment rates decreased from year 1 of participation (47%) to year 5 (39%).

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

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 which allow HACSB to provide up to two years of additional rental assistance. Hardship exemptions may be approved under the following 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. Extensions under the TLA program are also subject to funding availability. HACSB reserves the right to pause (temporarily discontinue approval of) new extensions if sufficient funding is not available to support the household for the duration of the extension without jeopardizing continued assistance for other customers.

### Total Term:

The total term of assistance under the program, including any approved hardship exemption, shall not exceed seven years. Note: An exception to this total term limit was made 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.

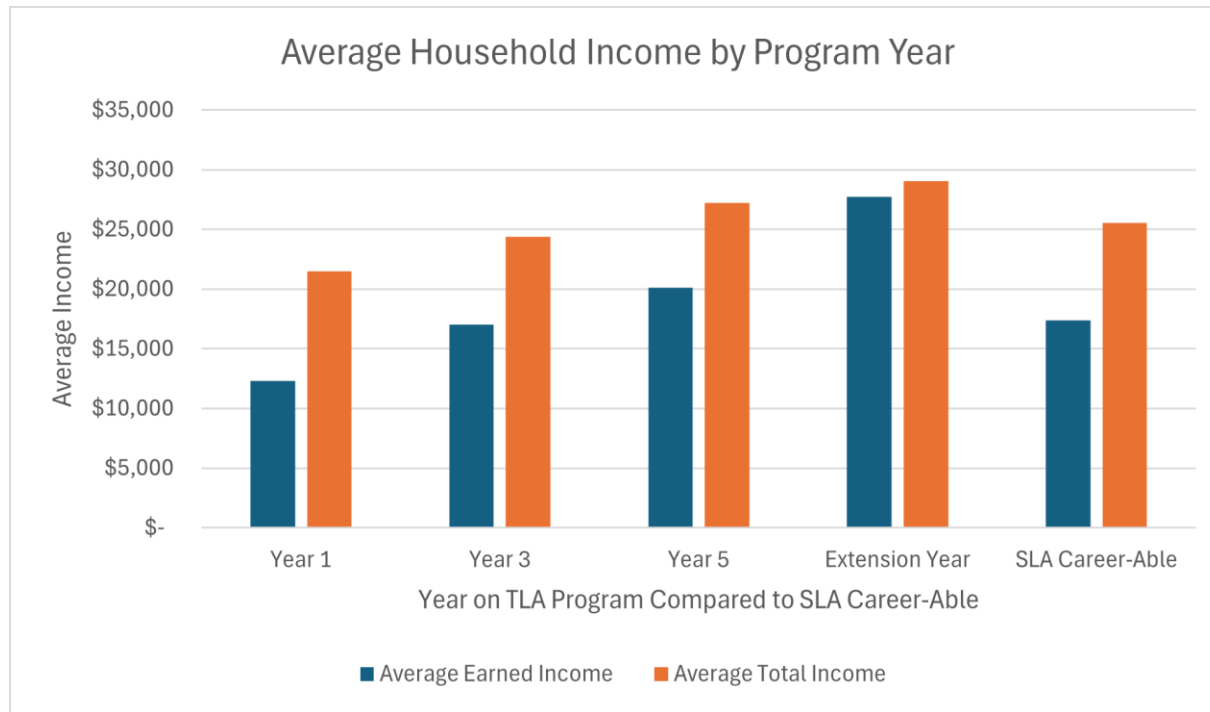
Emergency operations have ended, and normal operations have resumed. Emergency operations may be reenacted in the future in response to a resurgence of the current pandemic or another local disaster, emergency, or other crisis situation.

### FY 2025 MTW Report Program Outcomes

1,835 households were participating in the TLA program on September 30, 2025 (FYE). The outcomes below represent a cross-sectional analysis of those households by year of program participation, rather than a longitudinal evaluation of within-household changes.

<b>Activity 20: Term-Limited Lease Assistance Program</b>		
<b>Average Household Income by Program Year*</b>		
Program Year	Average Earned Income	Average Total Income
Year 1	\$12,293	\$21,464
Year 3	\$17,024	\$24,354
Year 5	\$20,127	\$27,240
Extension Year	\$27,724	\$29,058
For Comparison: Streamline Lease Assistance (SLA) Program: Career-Able (no term-limit)	\$17,375	\$25,562

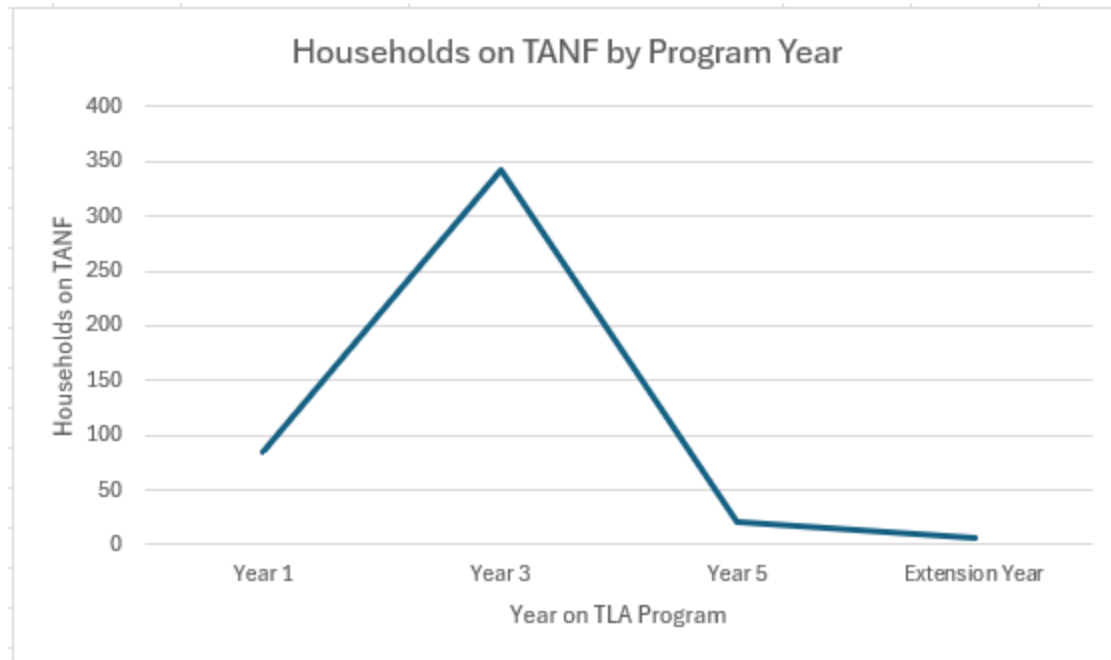
\*Note: Household income is collected on a biennial schedule due to HACSB's MTW Activity #4: Biennial Recertifications. Therefore, income data is collected at admission (year one) and updated at the household's third and fifth years in the program. Years two and four are not represented in the table as updated income data is not collected for those years.



The average earned income of households in the Extension Year is more than double the average earned income of households in their first year of assistance. This comparison highlights the positive effects of engaging in employment activities and other supportive services for the full duration of assistance. While the data shows positive growth in earned income, the average earned income for households in Year 5 and extension year remains below the one-person low-income limit of \$62,650 for San Bernardino County.

**Activity 20: Term-Limited Lease Assistance Program**  
**Households Receiving Temporary Assistance for Needy Families (TANF)**

Program Year	Households Receiving TANF
Year 1 Households	85
Year 3 Households	343
Year 5 Households	21
Extension Year Households	6

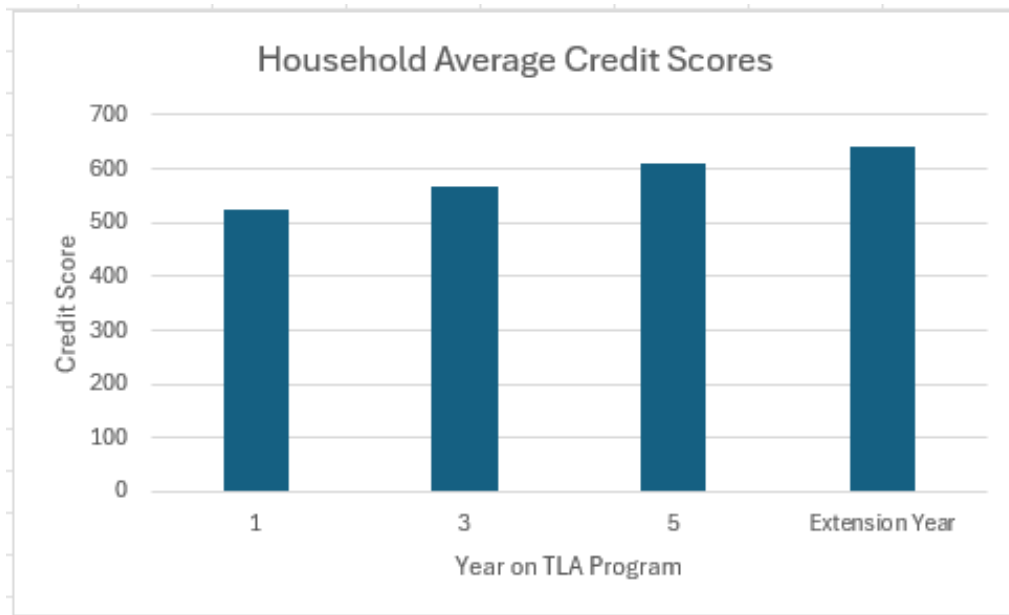


Households in Year 3 of the program have the highest rate of TANF use, which may reflect participants becoming more aware of and engaging in the supports available to them. TANF participation then declines in later years as families stabilize their income and achieve greater financial independence.

**Activity 20: Term-Limited Lease Assistance Program  
Average Household Credit Score**

Program Year	Average Credit Score
Year 1 Households	524
Year 3 Households	566
Year 5 Households	609
Extension Year Households	640

*\* Outcomes for credit scores are based upon self-reported data collected from 1,063 households participating in the TLA program and may not include all active TLA families.*



Households participating in the TLA program receive a range of supportive services, including referrals to financial literacy courses and credit repair resources. The data indicate that participants' credit scores improve the longer they remain in the program.

**Activity 20: Term-Limited Lease Assistance Program  
Outcomes in Employment Status**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome*</b>	<b>Benchmark Achieved?</b>
Employed Full-Time	Head(s) of work-able households with full-time employment prior to implementation of the activity is 32% in year 1 of this activity.	Expected head(s) of households with full-time employment after implementation of the activity is 39% by FY 2015 and thereafter.	Actual heads of work-able households with full-time employment is 37%. <ul style="list-style-type: none"> <li>• Year 1: 31%</li> <li>• Year 3: 37%</li> <li>• Year 5: 45%</li> <li>• Extension Year: 25%</li> </ul>	No, the outcome does not meet the benchmark for this metric.
Employed Part-Time	Head(s) of work-able households with part-time employment prior to implementation of the activity is 24% in year 1 of this activity.	Expected head(s) of households with part-time employment after implementation of the activity is 29% by FY 2015 and thereafter.	Actual head(s) of work-able households with part-time employment is 11.6%. <ul style="list-style-type: none"> <li>• Year 1: 14%</li> <li>• Year 3: 10%</li> <li>• Year 5: 10%</li> <li>• Extension Year: 31%</li> </ul>	No, the outcome does not meet the benchmark for this metric.
Unemployed	Head(s) of work-able households unemployed prior to implementation of the activity is 47% in year 1 of this activity.	Expected head(s) of households unemployed after implementation of the activity is less than 39% by FY 2015 and thereafter.	Actual head(s) of work-able households unemployed is 51%. <ul style="list-style-type: none"> <li>• Year 1: 55%</li> <li>• Year 3: 53%</li> <li>• Year 5: 47%</li> <li>• Extension Year: 44%</li> </ul>	No, the outcome does not meet the benchmark for this metric.

*\*Outcomes for these metrics are based on self-reported data collected from 1,417 households participating in the TLA program and may not include all active TLA families.*

**Activity 20: Term-Limited Lease Assistance Program  
Outcomes in Education Training Status**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome*</b>	<b>Benchmark Achieved?</b>
Enrolled in an Educational Program	Head(s) of work-able households enrolled in an educational program prior to implementation of the activity is 6% in year 1 of this activity.	Expected head(s) of households enrolled in an educational program after implementation of the activity is 8% by FY 2015 and thereafter.	Actual head(s) of work-able households enrolled in an educational program is 9%. <ul style="list-style-type: none"> <li>• Year 1: 10%</li> <li>• Year 3: 9%</li> <li>• Year 5: 3%</li> <li>• Extension Year: 13%</li> </ul>	Yes, the outcome meets the benchmark for this metric.
Enrolled in Job Training Program	Head(s) of work-able households enrolled in a job training program prior to implementation of the activity is 4% in year 1 of this activity.	Expected head(s) of households enrolled in a job training program after implementation of the activity is 7% by FY 2015 and thereafter.	Actual head(s) of work-able households enrolled in a job training program is 6%. <ul style="list-style-type: none"> <li>• Year 1: 3%</li> <li>• Year 3: 6%</li> <li>• Year 5: 0%</li> <li>• Extension Year: 6%</li> </ul>	No, the outcome does not meet the benchmark for this metric.
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 8% by FY 2015 and thereafter.	Actual head(s) of work-able households participating in other activities, leading to positive outcomes in employment status is 16%. <ul style="list-style-type: none"> <li>• Year 1: 10%</li> <li>• Year 3: 17%</li> <li>• Year 5: 20%</li> <li>• Extension Year: 6%</li> </ul>	Yes, this outcome meets the benchmark for this metric.

*\*Outcomes for these metrics are based on self-reported data collected from 1,417 households participating in the TLA program and may not include all active TLA families.*

<b>Activity 20: Term-Limited Lease Assistance Program Households Transitioned to Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
<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 2025 is 12 (48% of TLA households who exited the program during the FY).	No, the outcome does not meet the benchmark for this metric.

### iii. Actual Non-Significant Changes

None.

### iv. Actual Significant Changes

None.

## Activity 22: Streamlined Lease Assistance

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

- FY 2013: Initial approval.
- FY 2015: Implemented February 1, 2015.
- FY 2016: Modified to add “Streamlined Fixed Lease Assistance for New Non-Elderly/Non-Disabled Households”.
- FY 2017: Modified to add a unit size limitation for tenant-based voucher programs.
- FY 2018: Modified the rent tiers for career-able households newly admitted to or currently participating in the Streamlined Tiered Lease Assistance program from 21/24/27/30% to 30/33/36%.
- FY 2019: Modified the calculation of the tenant rent portion for new elderly and/or disabled households admitted to the Streamlined Fixed Lease Assistance program on or after January 1, 2019, to 30% of their gross income.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2025: Modified through FY 2025 MTW Annual Plan, Amendment 1, to revise the calculation of the tenant rent portion for all elderly and/or disabled households admitted to the Streamlined Lease Assistance program to 30% of their gross income. An additional tier allowing an increase to 36% in the future was also included.

### 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.

In cases where affordability restrictions from another HUD affordable housing program (including, but not limited to, the HOME Investment Partnerships Program) apply to a unit covered by this MTW activity, the Streamlined Lease Assistance (SLA) rent calculation will supersede any other such rent calculation or affordability covenant. Units covered by this MTW activity refers to units in which the tenant is a participant in HACSB's MTW rental assistance programs and the SLA rent calculation applies to that tenant.

#### **Streamlined Lease Assistance Program for Elderly/Disabled Households:**

**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.

Through HACSB's FY 2025 MTW Plan, Amendment 1, elderly and disabled households admitted to the program prior to January 1, 2019, with a current tenant TTP calculation of 24% will move up to the 30% tenant rent portion calculation, or HACSB's minimum rent, or baseline rent, whichever is greater. HACSB will gradually tier households up to the 30% TTP tier over the course of two years. The first year of implementation will increase to 27% TTP calculation, and in the second year will tier to 30% TTP 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. This component was implemented for new families briefed on or after January 1, 2019.

HACSB may implement an increase in the tenant rent portion of up to 36% to elderly and disabled households only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer families.

HACSB will apply the 36% TTP calculation to elderly and disabled households newly admitted to HACSB's program.

#### **Streamlined Lease Assistance Program for Moving On Strategy Households:**

The rent calculation for Moving On Strategy households (activity #29) rent share Total Tenant Payment (TTP) is the greatest of 24% of their gross income, the minimum rent, or baseline rent. No other households are being, or are anticipated to be, enrolled under this rent calculation.

#### **Streamlined Lease 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.

### 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:

#### At Admission

Family Monthly Gross Income:	\$1,000
Tier 1 Calculated Rent (30%):	\$300 ← Family Rent Share
HACSB Minimum Rent:	\$125
Baseline Rent:	N/A

#### First Biennial Recertification

Family Monthly Gross Income:	\$900
Tier 2 Calculated Rent (33%):	\$297
HACSB Minimum Rent:	\$125
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 household's rent share at 21%/24%/27%/30% of gross income, the minimum rent, or baseline rent. The rent tier structure was changed to the current three-tier structure through our FY 2018 Annual MTW Plan. Beginning February 1, 2018, all households were moved from their current tier to the new Tier 1 (30%) and received an automatic six-month hardship exemption which delayed any change in their rent portion. All households in the program at the time of the revision and those admitted since that time have remained at the 30% rent tier. HACSB intends to implement the additional rent tiers of 33% and 36% only if internal analysis demonstrates that it is necessary to ensure financial viability of the program without terminating assistance or serving fewer households. We continue to monitor program costs and households rent burden to determine if implementation of the additional rent tiers is appropriate.

In 2024, internal analysis identified the need to modify the rent calculation methodology to maintain the financial sustainability of the program without reducing the number of households served or terminating assistance. As a result, the 36% rent tier was implemented on October 1, 2024, for all current SLA households that are non-elderly and non-disabled. To support households during the transition, an automatic six-month hardship exemption was granted, postponing any increase in the tenant rent portion until April 1, 2025. Effective April 1, 2025, all non-elderly, non-disabled households TTP is the greater of 36% of their gross income, the minimum rent, or the baseline rent.

### 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.

<b>Activity 22: Streamlined Lease Assistance Program</b>				
<b>Agency Cost Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
Total cost of recertifications.	Total cost of recertifications prior to implementation of this activity is \$176,524 in FY 2014  \$165,492 staff cost + \$11,032 postage cost  Staff Cost Calculation: 4,943 hours X \$33.48 per hour	\$158,872 in FY 2017 and beyond.	\$153,400  \$145,804 staff cost + \$7,596 postage cost  Staff Cost Calculation: 3,474 hours X \$41.97 per hour. The hourly rate for this report has been updated to reflect the current loaded labor rate.	Yes, the outcome meets the benchmark for this metric.

<b>Activity 22: Streamlined Lease Assistance Program</b>				
<b>Staff Time Savings</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.	3,474 Hours.  Staff Time Calculation: 3,021 SLA recertifications performed X 1.15 hours per recertification.	Yes, the outcome meets the benchmark for this metric.

**Activity 22: Streamlined Lease Assistance Program**  
**Decrease in Error Rate of Task Execution**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 4%.	Yes, the outcome meets the benchmark for this metric.

**Activity 22: Streamlined Lease Assistance Program**  
**Reducing Per Unit Subsidy Costs for Participating Households**

<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 \$1,320.	No. However, tenant rent shares are also increasing which illustrates that the HAP subsidy increase reflected here is related to the overall increase in rents for assisted households.

<b>Activity 22: Streamlined Lease Assistance Program Increase in Tenant Rent Share</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 \$651.	Yes, the outcome meets the benchmark for this metric.  In April of 2025, HACSB implemented the 36% rent tier for career-able households on SLA resulting in an increase in the tenant rent share.

### iii. Actual Non-Significant Changes

Language was added in the description of the activity to clarify in cases where affordability restrictions from another HUD affordable housing program (including, but not limited to, the HOME Investment Partnerships Program) apply to a unit covered by this MTW activity, the Streamlined Lease Assistance (SLA) rent calculation will supersede any other such rent calculation or affordability covenant.

### iv. Actual Significant Changes

In FY 2025, HACSB modified this activity through FY 2025 MTW Annual Plan, Amendment 1, revising the calculation of the tenant rent portion for all elderly and/or disabled households admitted to the Streamlined Lease Assistance program to 30% of their gross income. An additional tier allowing an increase to 36% in the future was also included. HACSB received approval from HUD for these modifications on June 4, 2025. Implementation of these changes will occur in FY 2026.

## 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.

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<b>Activity 23: No Child Left Unsheltered Increase in Resources Leveraged</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 \$288,353 in FY 2025.	Yes, the outcome exceeds the benchmark for this metric.

<b>Activity 23: No Child Left Unsheltered Households Transitioned to Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 2025 is 0.	Yes, the outcome meets the benchmark for this metric.

<b>Activity 23: No Child Left Unsheltered Households Housed through This Activity</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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.	18 households were housed through this activity at FYE 2025.	Yes, the outcome meets the benchmark for this local metric.

### iii. Actual Non-Significant Changes

None.

### iv. Actual Significant Changes

None.

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

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

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

### 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.

<b>Activity 24: Transition for Over-Income Public Housing/Housing Choice Voucher Families</b>				
<b>Households Transitioned to Self-Sufficiency</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 2025 is 1.	No, the outcome does not meet the benchmark for this metric.

iii. Actual Non-Significant Changes

None.

iv. Actual Significant Changes

None.

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

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

- FY 2016: Initial approval.

### ii. Description/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.

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<b>Activity 25: Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing</b>				
<b>Increase in Resident Mobility</b>				
<b>Unit of Measurement</b>	<b>Baseline</b>	<b>Benchmark</b>	<b>Outcome</b>	<b>Benchmark Achieved?</b>
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 (48 as of 9/30/2025).  The occupancy rate for FY 2025 was 96.25%.	Yes, the outcome meets the benchmark for this metric.

**iii. Actual Non-Significant Changes**

None.

**iv. Actual Significant Changes**

None.

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

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

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

### ii. Description/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 structures<sup>3</sup>. 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.

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<sup>3</sup> "CalFire Incident Information – Blue Cut Fire," fire.ca.gov, August 23, 2016. [http://www.fire.ca.gov/current\\_incidents/incidentdetails/Index/1391](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.

## iii. Actual Non-Significant Changes

None.

## iv. Actual Significant Changes

None.

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

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

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

### ii. Description/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.
- 91 units at Alder Square in San Bernardino. These units use the HACSB Subsidy and Income Band TTP Calculation – Type One.
- 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

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 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.
  - For the 91 units at Alder Square, the Operating Cost Adjustment Factor (OCAF) published annually by HUD will be applied to the aggregate RAD subsidy provided by HUD for the property.
- 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 plans to apply Type One of this activity to new developments Arrowhead Grove Phase IV (Alder Square), and Valencia Grove Phase II.

### 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.

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<b>Activity 27: Local Project-Based Voucher Subsidy for Tax Credit Developments</b> <b>Additional Units of Housing Made Available</b>				
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 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.	124 RAD-PBV tax credit units were available for households at or below 80% AMI during the FY.	<i>Yes, the outcome exceeds the benchmark.</i>

iii. Actual Non-Significant Changes

Language was added specifying that HACSB will increase the housing authority subsidy for Alder Square by applying the Operating Cost Adjustment Factor (OCAF) published annually by HUD to the aggregate RAD subsidy provided by HUD for the property.

iv. Actual Significant Changes

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.

### iii. Actual Non-Significant Changes

None.

### iv. Actual Significant Changes

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.

### **FY 2025 MTW Report Program Outcomes**

At the end of this reporting year, there were 24 households and 41 total participants in the Moving On program. We also began an evaluation of this initiative with our research partner Loma Linda University. When complete, this evaluation will establish baselines to measure outcomes for this initiative in future reports.

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

None.

### **iv. Actual Significant Changes**

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 1: Single-Fund Budget

#### i. Approval, Implementation, and Close-Out Years

This activity was approved through our FY 2009 Annual MTW Plan and was implemented in 2009. This activity is being closed out through HACSB's FY 2025 Report.

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

This activity is being closed because the Single-Fund Budget authority has been institutionalized as a standard operational feature under HACSB's MTW Agreement with HUD.

### 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

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## A. Financial Reporting

### i. Available 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. Expenditures of MTW Funds in the Plan Year

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

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## 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 (TLA) 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. The latest evaluation of the TLA program was finalized in November of this report's year. This evaluation established a new baseline for future research of the impact of the case management services offered by our Family Empowerment Services team.
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 is currently on hold.
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). The most recent evaluation was completed in the 2024 Plan Year, 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 study of this program is currently underway to create a baseline report using initial data from the Moving On program. LLU will use data from HACSB and the San Bernardino County Department of Behavioral Health to better understand the impact of the program. Specific research questions will focus on factors that influence a household's stability, services provided to Moving On households, service gaps, and overall impacts to households.

**Other Evaluations:** Although not a MTW initiative, HACSB collaborated with LLU for an evaluation of the Emergency Housing Voucher (EHV) program. HACSB was allocated 455 EHV 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, including information from the housing navigation service provider, LLU provided a report focusing on program demographics, sources of income, and reasons for exit.

# C. MTW Energy Performance Contract (EPC) Flexibility Data

Not Applicable.

# Appendices

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## 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 Meadows	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 - Alder Square	92	92	Committed	R-R	Currently in Development	San Bernardino
Arrowhead Woods	51	50	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	40	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	39	Leased/Issued	No	Affordable Senior Community	Twin Peaks
Highland - 9th Street	12	12	Leased/Issued	Yes	Affordable Family Community	Highland

Property Name	Planned	Actual	Status at End of Plan Year	RAD	Description of Project	City
Horizons at Yucaipa	50	49	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	17	Leased/Issued	No	Supportive Housing for Homeless Families	Various
Northport Apartments	29	29	Leased/Issued	No	Affordable Family Community	Victorville
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	47	47	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
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
<b>Total</b>	<b>2,621</b>	<b>2,594</b>				

**Description of Differences between the Planned and Actual Existing Number of Vouchers Project Based:** The reduction in the number of actual PBV units is due to corrections to exclude unsubsidized manager units from 4 properties and the transfer of 23 vouchers from PBV to tenant-based in the NCLU Scattered Sites.

## 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 2025</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.”)	312
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.	76
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	427
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	449

	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.	108

## 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 2025</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.	27
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.	201

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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.

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

NO.	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
1	Single Fund Budget	Cost Effectiveness	FY 2009	Closed Out
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	Closed Out
20	Term-Limited Lease Assistance Program	Economic Self-Sufficiency	FY 2011	Implemented
21	Utility Allowance Reform	Cost Effectiveness	FY 2012	Closed Out
22	Streamlined Lease Assistance Program	Cost Effectiveness	FY 2013	Implemented
23	No Child Left Unsheltered	Economic Self-Sufficiency	FY 2014	Implemented
24	Transition for Over-Income Families	Economic Self-Sufficiency	FY 2014	Implemented
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

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