

NOTICE OF PUBLIC HEARING

On March 14, 2008, the U.S. Department of Housing and Urban Development (HUD) executed a ten-year Moving to Work (MTW) Agreement with the Housing Authority of the County of San Bernardino (HACSB) and in April 2016 that agreement was extended through 2028. In March 2024, the agreement received a second extension through 2038. As an MTW agency, HACSB is provided with flexibility and authorization to develop policies and programs that are outside the limitations of certain HUD regulations. This allows HACSB to more successfully achieve its mission, program goals, and to enhance its ability to serve the needs of low-income families in San Bernardino County.

In continuing to develop its MTW program and address community and customer needs, HACSB has prepared its Fiscal Year 2026-27 Annual MTW Plan (Plan). The Plan will be made available to the public for review for 30 days starting Monday, June 1, 2026, at the following location:

Housing Authority of the County of San Bernardino
Administrative Office
715 E Brier Dr.
San Bernardino, CA 92408

The Plan is available on HACSB's website at <https://hacsb.com>. Click "About HACSB" then select "Moving to Work" from the drop-down menu. The Plan is also available at any HACSB satellite office.

Notice is hereby given that HACSB will conduct a public hearing regarding the proposed Plan on the following days:

- Tuesday, June 16, 2026, at 10:00 a.m. at 715 E Brier Dr, San Bernardino, CA 92408, and
- Wednesday, June 17, 2026, at 1:00 p.m. at 715 E Brier Dr, San Bernardino, CA 92408

If a member of the public wishes to challenge the nature of the above action(s) in court, they may be limited to raising only those issues they or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the HACSB office located at 715 E Brier Dr, San Bernardino, CA 92408 prior to the close of the public comment period on June 30, 2026.

In accordance with the Rehabilitation Act of 1973, HACSB will make reasonable efforts to accommodate persons with disabilities. Please call (909) 890-0644 at least three days in advance if you require special accommodations.

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Housing Authority of the
County of San Bernardino
Building Opportunities Together

2027

MOVING TO WORK

— ... —

ANNUAL PLAN



BOARD OF COMMISSIONERS



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County of San Bernardino
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MICHAEL THOMAS



SID JAIN

OUR MISSION



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

OUR VISION



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

OUR CORE VALUES



Respect

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

Safety

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

Integrity

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

Service

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

Innovation

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

HACSB Leadership Team



Housing Authority of the
County of San Bernardino
Building Opportunities Together



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Executive Director



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FOR MORE INFORMATION

Should you have any questions or need additional information, please contact Renee Kangas, Senior Management Analyst at: rkangas@hacsb.com.

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I. Introduction

Who We Are

Our core work is to provide rental assistance to prevent homelessness among low-income households. As the largest provider of affordable housing in San Bernardino County, the Housing Authority of the County of San Bernardino (HACSB) proudly assists approximately 27,600 people, most of whom are seniors, individuals with disabilities, veterans, and children. Since 1941, we have helped low-income families attain safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). As of January 1, 2026, more than 11,200 households are served through housing assistance payments made to landlords on behalf of families or reside in units owned and managed by HACSB. These programs provide a critical safety net for households in San Bernardino County, where a family would need to earn over three times the minimum wage to afford rent for a two-bedroom apartment.

We understand that housing a family is the first step on their path to self-sufficiency. HACSB builds strong partnerships within San Bernardino County to help provide opportunities and create a meaningful difference in the lives of families we serve, maximizing our resources 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 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 affordable rental communities that are not federally funded, bringing additional affordable housing opportunities to our communities in addition to the traditional rental assistance programs we administer. Our service to the community is built upon our Vision, Mission, and Core Values. These principles direct our efforts and guide our interactions with every customer.



Housing Authority of the
County of San Bernardino

Building Opportunities Together



Rental Assistance Programs

11,200 households



Supportive Housing

933 households

The Moving to Work Designation

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

1. Reduce program costs and increase cost efficiency

2. Encourage assisted families to pursue economic self-sufficiency

3. Increase housing choice for low-income families

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

In 2008, Congress designated HACSB as a MTW agency. Since receiving the MTW designation, HACSB has developed and received approval for 30 MTW activities.

Contents of This Plan

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

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

Long-Term Goals

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

HACSB’s Aspirational Statements are:

Aspirational Statement #1

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

Aspirational Statement #2

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

Aspirational Statement #3

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

Aspirational Statement #4

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

Aspirational Statement #5

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

Short-Term Goals

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

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

- Research, implement and maintain technology to improve service delivery and enhance external communication.
- Use software systems to enhance, streamline, and increase productivity.
- Use Moving to Work flexibilities and research-informed policy decisions to drive and expand innovation.
- The work environment is collaborative, diverse, equitable, and inclusive, and offers opportunities for interaction.
- Identify, reorganize, and implement financial processes to assist in monitoring HACSB’s major programs and portfolio.

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

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

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

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

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

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

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

II. Operating Information

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

A. Housing Stock Information

i. Planned New Public Housing Units

HACSB plans to add 91 new Public Housing units through Restore-Rebuild at our Arrowhead Grove Phase IV development in FY 2027. Construction of these units is expected to be completed in Summer 2027.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE	SECTION 504 ACCESSIBLE UNITS* (MOBILITY)	SECTION 504 UNITS* (HEARING/VISION)
	0/1	2	3	4	5	6+				
CA019000120	22	46	23	0	0	0	91	N/A	N/A	N/A
Total Public Housing Units to be Added in the Plan Year							91			

ii. Planned Public Housing Units to be Removed

As mentioned above, HACSB plans to add 91 units of Public Housing at Arrowhead Grove Phase IV. These units will be converted to Rental Assistance Demonstration (RAD) project-based vouchers through the Restore-Rebuild process. HACSB does not have a firm date for the conversion of these units from Public Housing through the RAD transition. HACSB anticipates the conversion will take place in FY 2027 and is therefore listing the 91 units as Public Housing to be removed during the Plan FY. The RAD conversion plan for Arrowhead Grove Phase IV was previously submitted through HACSB’s FY 2026 MTW Annual Plan

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
CA019000120	91	Restore-Rebuild/RAD Conversion
Total Public Housing Units to be Removed in the Plan Year	91	

iii. Planned New Project-Based Vouchers

In FY 2027 the Public Housing units that will be constructed through Restore-Rebuild at the Arrowhead Grove Phase IV development will be converted to Project-Based Voucher (PBV) units through the RAD program. Because these units are being converted from Public Housing through a RAD transaction, they are listed here as planned new PBV units.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD?	DESCRIPTION OF PROJECT
Arrowhead Grove Phase IV	91	Yes	New Construction
Total Planned new Project Based Units in Plan Year	91		

iv. Existing Project-Based Vouchers

See Appendix C. for list of the project-based vouchers, including Rental Assistance Demonstration (RAD) project-based vouchers and non-MTW vouchers for the Plan Year. Four of the existing PBV properties on the table have a one-unit reduction from last year to adjust for unsubsidized manager units.

Per approval from the U.S. Department of Housing and Urban Development (HUD), HACSB may convert up to 30% of its total MTW baseline units from tenant-based voucher (TBV) to project-based voucher (PBV) units. The 30% PBV threshold limits the negative impact to HACSB customers and administration of the Housing Choice Voucher (HCV) program.

HACSB has already project-based nearly 30% of its portfolio at properties throughout San Bernardino County. Currently, a maximum of 301 vouchers may still be converted from TBV to PBV. These units will be used to support the redevelopment of our aging former public housing communities. Because HACSB receives no capital funding to support redevelopment efforts, the ability to leverage these remaining PBV units is vital to ensure that we can rehabilitate our oldest public housing communities to preserve affordable housing for future generations.

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

HACSB does not have other plans to change our housing stock in FYE 2027.

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

HACSB continues towards the completion of the fourth phase of redevelopment at Arrowhead Grove, which will add 91 new units of affordable housing. The financial structure to fund this phase has been completed and the project is under construction. The completion of this fourth phase will take the total unit count to 412 compared to the original 252 public housing units on the site. The Restore/Rebuild Conversion Plan for Arrowhead Grove Phase IV was included as an exhibit in HACSB's FY 2026 MTW Plan.

HACSB has also converted its entire Public Housing portfolio under the Rental Assistance Demonstration (RAD) program with the exception of one unit. HACSB will continue to use the reserves established via this conversion to continue performing annual physical needs work at the properties.

While future increments of Capital Funds are no longer available, HACSB's major Public Housing redevelopment efforts continue in Redlands (AMP 150, sites 19-01, 8 & 9) where the second phase, Valencia Grove Phase II, a new construction development completed in 2026 added 103 units of affordable housing to the site to complement the 85 Phase I units that were completed in 2016. We are utilizing an innovative financing structure to support this development, including a general obligation bond issuance leveraged with an HACSB ground lease loan, development loan, and two Housing Partners I, Inc. (HPI) equity loans secured through the refinancing of various portfolio properties.

B. Leasing Information

i. Planned Number of Households Served

The following table presents projected voucher utilization for MTW vouchers and Public Housing occupancy for HACSB's single remaining Public Housing unit at the end of FY 2027.

Housing Assistance Payment (HAP) expenses have risen over the previous several years and are expected to increase further in FYE 2027, while funding has not kept pace with the rising costs.

The MTW Public Housing units anticipated to be leased include one single-family home in AMP 180 comprising twelve unit-months. A total of 1 family is expected to be served through Public Housing during FY 2027.

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

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED
MTW Public Housing Units Leased	12	1
MTW Housing Choice Voucher (HCV) Utilized	118,968	9,914
Local, Non-Traditional: Tenant-Based	0	0
Local, Non-Traditional: Property-Based	0	0
Local, Non-Traditional: Homeownership	0	0
Planned Total Households Served	118,980	9,915

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

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

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	None.
MTW Housing Choice Voucher	Market rents have continued to rise substantially over the past several years, resulting in per-unit cost (PUC) that exceeds per-unit funding (PUF). HACSB is implementing several rent reform pathways using MTW flexibility to reduce the PUC in order to serve more households without exceeding funding levels. 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. Additionally, in FY 2026, HACSB implemented an increase in the rent calculation for all elderly-disabled households from 24% to 30%, as approved by HUD through HACSB's FY 2025 MTW Annual Plan, Amendment 1. In FY 2027, HACSB will implement an increase in the minimum rent increasing the minimum rent from \$125 to \$450 for career-able households and elderly-disabled households with career-able households members residing in the unit, as approved by HUD through HACSB's FY 2025 MTW Annual Plan, Amendment 1. This increase will be implemented in phases for currently assisted households. In FY 2027, if sufficient funding is available, HACSB plans to transfer households on the Emergency Housing Voucher (EHV) program to the Housing Choice Voucher (HCV) Tenant Based Voucher (TBV) program and pull from the TBV wait list.
Local, Non-Traditional	N/A.

C. Waiting List Information

HACSB anticipates that community need for affordable housing will remain high in FYE 2027. The following table shows the projected number of households on wait lists for Public Housing units and voucher programs as of the beginning of FYE 2027. HACSB does not currently envision organizational or policy changes to wait lists. Applicants may be, and often are, on multiple wait lists at the same time. This duplication is described in the following tables.

Housing Choice Vouchers

HACSB maintains a single tenant-based voucher (TBV) wait list. The TBV wait list was previously opened for 24 days in June 2022; 26,170 applications were received. The wait list is now closed. However, HACSB continues to accept Family Unification Program (FUP) referrals to the wait list as FUP referrals are available. We do not anticipate opening the TBV wait list in FYE 2027.

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

In May 2024, HACSB opened a new PBV wait list for Valencia Grove, Phase II, a new Restore-Rebuild development that began leasing in Spring 2026.

In June 2025, through a Board-approved action, 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 program due to insufficient funding. The EHV program was scheduled to sunset in FY 2030 but is now projected to end in 2026 due to lack of funding. The PBV wait list preference will allow some EHV customers to transition from EHV assistance to PBV assistance 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. In FY 2027, If sufficient funding is available, HACSB plans to transfer households on the Emergency Housing Voucher (EHV) program to the Housing Choice Voucher (HCV) Tenant Based Voucher (TBV) program.

We are initiating an audit of our wait lists in 2026 to reconfirm interest on the wait list from applicants. This work will continue during FYE 2027.

Public Housing and Rental Assistance Demonstration Units

Site-specific wait lists are offered by bedroom size for all HACSB Rental Assistance Demonstration (RAD) communities. All wait lists under this program are maintained centrally to maximize efficiencies and promote housing choice.

HACSB’s application for conversion of a large portion of its portfolio under the RAD program was approved in December 2014, and the process of converting all sites (with the exception of one single-family home) was completed in calendar year 2022. As a result, HACSB moved all applications on the wait lists for the converted Public Housing sites to site-based RAD PBV wait lists. The applications retain their original date and time of application and are subject to the preferences that apply to the PBV wait lists. Applicants were notified of the change and offered the opportunity to opt out of placement on the HACSB PBV wait lists.

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

i. Waiting List Information Anticipated

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
Public Housing	Centrally managed, site-specific, by bedroom size	0	Closed	No
Rental Assistance Demonstration Sites - PBV	Centrally managed, site-specific, by bedroom size	83,941	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher – Project-Based	Centrally managed, site/region-specific, by bedroom size	92,683	Partially Open	Yes, by bedroom size as needed
Housing Choice Voucher – Tenant-Based	Community-wide	24,956	Closed	No

DESCRIPTION OF DUPLICATION OF APPLICANTS ACROSS WAITING LISTS
45.76% of applications are duplicates, representing families who have applied to two or more waiting lists. There are 109,336 unduplicated households on HACSB’s waiting lists.

ii. Planned Changes to Waiting List in the Plan Year

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Rental Assistance Demonstration Sites – PBV	Site-based waiting lists may be opened or closed based on vacancies.

III. Proposed Activities

HACSB is not proposing or reproposing any MTW activities through this Annual MTW Plan.

IV. Approved Activities

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/Update

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

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

Biennial/Triennial Recertification Process

- HACSB will perform a full recertification to examine household income and composition once every three years for elderly-only and disabled-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.

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

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

Language was added to include disabled-only households with fixed incomes in the triennial recertification process.

iv. Planned Significant Changes

None.

Activity 5: Simplified Income Determination

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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 or ongoing program participation.

Elimination of Earned Income Disallowance

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

Local Income Inclusions and Exclusions

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 8: Local Policies for Portability

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 10: Minimum Rent

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval. The activity was implemented on October 1, 2009, for recertifications of currently served households and on January 1, 2010, for all new families.
- FY 2019: A non-significant modification was made to require households paying the minimum rent to participate in supportive services offered by HACSB. Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.
- FY 2023: Modification to reduce or postpone the minimum rent for HACSB developments or programs serving extremely vulnerable populations.
- FY 2025: Modified through FY 2025 MTW Annual Plan, Amendment 1, to increase the minimum rent from \$125 to \$450 for most MTW households.

ii. Description/Update

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

This activity allows HACSB to increase the minimum rent to \$125 from the current regulatory maximum of \$50 per month for all households in both the Public Housing and Housing Choice Voucher Programs. The activity applies to MTW 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 informed by an analysis of 36% of gross monthly income for a household with one member earning California's current minimum wage (\$16/hour) and working part-time, approximately 20 hours per week.

This change will apply to current and new:

- Career-able households (as defined in HACSB's Administrative Plan and ACOP); 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;
- 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;
- Other populations/programs (current and future) identified in HACSB’s Administrative Plan and Admissions and Continued Occupancy Policy (ACOP) documents as fixed \$125 minimum rent;
 - 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.

HACSB will begin implementing the new minimum rent on October 1, 2026.

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.

Current households paying \$125 minimum rent will be transitioned to the new \$450 minimum rent according to the schedule reflected in the table below. Households will automatically move to the next minimum rent tier at subsequent recertifications until they reach the \$450 tier.			
Household Categories:	1st recertification after approval	2nd recertification after approval	3rd recertification after approval
Extremely vulnerable populations as identified in HACSB’s Administrative Plan and ACOP.	\$125 (no change)		
Elderly/disabled households with one or more career-able household members residing in the unit.	\$225 OR income-based rent (percentage of income based on applicable SLA tier) – whichever is greater	\$325 OR income-based rent (percentage of income based on applicable SLA tier) – whichever is greater	\$450 OR income-based rent (percentage of income based on applicable SLA tier) – whichever is greater
Career-able households.			

All other current households whose current tenant rent portion falls between \$125 and \$450 will be placed into a minimum rent tier based on income bands. Households will automatically move to the next minimum rent tier at subsequent recertifications until they reach the \$450 tier.

Career-able households and elderly/disabled households with career-able members residing in the unit in the following income bands:	Starting Minimum Rent at 1 st recertification after approval	2 nd recertification after approval	3 rd recertification after approval
\$4,168 - \$7,500	\$225	\$325 OR income-based rent (percentage of income based on applicable SLA tier) – whichever is greater	\$450 OR income-based rent (percentage of income based on applicable SLA tier) – whichever is greater
\$7,501 - \$10,833	\$325	\$450 OR income-based rent (percentage of income based on applicable SLA tier) – whichever is greater	
\$10,834 - \$15,000	\$450		

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 11: Local Project-Based Voucher Program

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

- Project-based assistance at properties owned by HACSB or an affiliate of HACSB that are not Public Housing.
- A reasonable competitive process for project-basing leased housing assistance at units in which HACSB or a related affiliate has no ownership interest that meet existing Housing Quality Standards, or any standards developed by HACSB through a MTW activity, and that are owned by non-profit and for-profit housing entities.
- Alternate standards for determining the location of existing, newly constructed, or substantially rehabilitated housing to receive subsidy in compliance with the requirements outlined in Attachment C of our MTW Agreement.
- Up to 100% percent of units in any development may be project-based.
- Up to 30% (including RAD-PBV units) of HACSB's total MTW baseline number of units may be allocated for PBV.

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

- HACSB may project-base vouchers for unit types which are not allowable under traditional regulatory PBV. The types of housing which may be assisted through PBV include the following:
 - Shared housing (up to one person per bedroom);
 - Units on the grounds of a penal, reformatory, medical, mental health, or similar public or private institution;
 - Nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care;
 - Manufactured homes;
 - Transitional housing;
 - Single-room occupancy;
 - Congregate housing;
 - Other housing types as needed.
- Where appropriate, HACSB will partner with universities, state and local government, and other stakeholders to develop housing and service delivery programs which leverage HACSB and partner resources. Where appropriate and feasible, programs will include both housing and related health care, education, job preparedness, and/or other necessary supportive services for individuals assisted through the programs.
 - To ensure that assisted households receiving on-site supportive services through an HACSB partner continue to reside at the location where the services are provided, HACSB may not provide a tenant-based voucher upon completion of the initial two-year term of assistance. Assisted households will be notified at move-in whether they will be eligible to receive a tenant-based voucher.
- HACSB may allow all PBV units to remain on the PBV contract even if the unit is not leased or no housing assistance payment (HAP) is made for more than 180 days. During the term of the HAP contract, HACSB will not temporarily remove units from the contract that are vacant for over 120 days or in which no HAP has been paid for 180 days. Unit substitutions may occur when possible. HACSB may permanently remove units during the term of the HAP contract if the owner has failed to make good faith efforts to fill vacancies or is in violation of Housing Quality Standards. Regulations currently require units to be removed from the PBV contract if no HAP has been paid for more than 180 days. This modification will allow an increase in accessibility to housing for some of our most vulnerable population, such as No Child Left Unsheltered (NCLU) customers, by allowing HACSB to keep units under PBV contract that will in turn allow rapid housing options for these customers, rather than removing and re-adding units numerous times through a time-consuming process and the PBV unit remaining vacant during that process.
- 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:
 - Under-utilization of project-based vouchers in certain circumstances; and
 - Loss of assistance for some Emergency Housing Voucher (EHV) households due to the program's end of funding.

- 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.
- Effective October 1, 2025, HACSB will cap the Housing Assistance Payment (HAP) for new RAD developments 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.
- 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 program. The EHV program was scheduled to sunset in FY 2030, but is now projected to end in FY 2026 due to lack of funding. The PBV wait list preference will allow some EHV customers to transition from EHV assistance to PBV assistance 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) Inspection Standards – Number of Inspections to be Performed

HACSB allows 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 new project-based voucher contract awards. This component has not yet been implemented for any PBV site, but HACSB anticipates that it will be used for future PBV awards.

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

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

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

Per approval from the U.S. Department of Housing and Urban Development (HUD), HACSB may convert up to 30% of its total MTW baseline from tenant-based voucher (TBV) to PBV units. This maximum was established to mitigate the disadvantages of project-basing a large percentage of vouchers, such as:

- Project-based vouchers do not offer the same freedom of housing choice as tenant-based vouchers. Because PBV units are, by definition, affiliated with specific properties, customers must reside at that location in order to receive the PBV rental assistance. By comparison, customers in the tenant-based voucher (TBV) program may live in any community of their choice.
- Moves from the PBV program to the TBV program reduce our ability to serve customers from our TBV wait list. Program regulations require housing authorities to give priority to PBV customers exercising their right to move under the TBV program. Moves from PBV to TBV therefore reduce the number of new applicants we can select from our TBV wait list. Additionally, in some cases, customers may choose to reside at a PBV community in order to avail themselves of the opportunity to quickly move to the TBV program and circumvent the years-long TBV wait list.
- Project-based vouchers require more resources than tenant-based vouchers. For example, PBV mobility requires the housing authority to administer both a new TBV issuance and lease-up and a PBV lease-up to back-fill the vacated unit. Additionally, for PBV units managed by HACSB, the cost and time associated with turning over the vacated unit increases the administrative burden of PBV.

The 30% PBV threshold limits the negative impact to HACSB customers and administration of the Housing Choice Voucher program.

HACSB has already project-based nearly 30% of its portfolio at properties throughout San Bernardino County. Currently, a maximum of 301 vouchers may still be converted from TBV to PBV. These units are reserved to support the redevelopment of our aging public housing communities. Because HACSB receives no capital funding to support redevelopment efforts, the ability to leverage these remaining PBV units is vital to ensure that we can rehabilitate our oldest public housing communities to preserve affordable housing for future generations.

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 12: Local Payment Standards and Alternative Flat Rents

i. Plan Year Approved, Implemented, Amended

- FY 2009: Initial Approval.
- FY 2011: Implemented on July 1, 2011, for all new lease ups and recertifications.
- FY 2012: Modified to use the maximum subsidy as determined through HACSB's annual market rent study as the guideline in determining the contract rent for voucher units.
- FY 2015: Modification proposed but not approved via Amendment 1B to our FY 2015 Plan. Per HUD's request, the proposed modification was re-proposed and approved through HACSB's FY 2017 Annual MTW Plan.
- FY 2017: Modified to apply Local Payment Standards as the maximum flat rent for Public Housing units.
- FY 2019: Authorization to apply this activity to participants of the Veterans Affairs Supportive Housing (VASH) program was received from HUD in September 2019. That approval, though not granted through the HUD MTW Office, was included in our FY 2019 Annual MTW Plan for informational purposes.
- FY 2020: Modified through FY 2020 Annual MTW Plan, Amendment 2, to add Emergency Operations in response to the coronavirus/COVID-19 pandemic.
- FY 2022: Authorization to apply this activity to participants of the Emergency Housing Voucher (EHV) program was received from HUD in July 2021, through a waiver request. That approval, though not granted through the HUD MTW Office, was included in our FY 2022 Annual MTW Plan for informational purposes.
- FY 2023: Authorization to conduct mid-year revisions to the Local Payment Standard (LPS) amounts, if necessary.
- FY 2026: Authorization to establish an exception payment standard for disabled households with an approved reasonable accommodation.

ii. Description/Update

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

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

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

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

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

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

To eliminate barriers for EHV participants, we will use a combination of HACSB Local Payment Standards and Payment Standards for traditional regulatory assistance for EHV participants. HACSB will group 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 MTW payment standards within the region 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 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. For VASH households, the exception payment standard would be the greater of 140% of the FMR or 140% 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 the steps to reduce contact between individuals, including reducing the number of employees in our offices through telework and alternative work schedules, expanding remote and virtual service options, and using prescheduled appointments for in-person customer service. HACSB implemented the following emergency operations for this activity:

- The 2020 annual review and update to the Local Payment Standards was delayed due to the limited availability of a third-party consultant to perform the market assessment. Additionally, the availability of market data for vacant units was limited by the extremely low vacancy rates, which ranged from two to four percent in different areas of the County.
- On January 20, 2022, HACSB received authorization for a temporary waiver through Notice PIH 2021-34 to increase payment standards up to 120% of HUD published FMR to support HACSB's leasing efforts. Temporary Local Payment Standards were implemented using this waiver authority effective March 9, 2022, and expired December 1, 2022.

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 13: Local Inspection Policies

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

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.

HACSB has established local inspection standards that integrate HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) and Housing Quality Standards (HQS) in order to better reflect local housing needs, ensure the health and safety of assisted households, and adherence to State of California safety codes. These local inspection standards will be specified in HACSB's Administrative Plan.

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

HACSB has incorporated language within the activity to clarify that local inspection standards will incorporate NSPIRE and HQS to better reflect local housing needs, ensure the health and safety of assisted households, and adherence to State of California safety codes.

iv. Planned Significant Changes

None.

Activity 14: Local Asset Management Program

i. Plan Year Approved, Implemented, Amended

- FY 2010: Initial approval.

ii. Description/Update

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 18: Property Management Innovation

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

- a. 3-Day Notice to Pay or Quit (previous policy was 14 days). This component was eliminated due to the RAD conversion of our Public Housing portfolio.
- b. NSF fees of \$25.00 for first and \$35 for additional items (previous policy was \$25.00).
- c. Late fees increased from \$20 to \$50.
- d. Security deposits equal to one month's market rent (current security deposit charged is \$500.00)
- e. Implement a holding deposit of \$200.00.
- f. Agency will choose lower of flat rent or the applicable rent calculation under HACSB's MTW Activity 22 – Streamlined Lease Assistance.
- g. Grievance Process – Previous two-step process was replaced with a single on-site settlement conference with staff for timely and effective resolution of issues. This component applies only to HACSB's single Public Housing unit.

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

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 20: Term-Limited Lease Assistance

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

This activity applies to new non-elderly and non-disabled households admitted to the Housing Choice Voucher program from HACSB’s waiting list, porting in from another jurisdiction, or exercising mobility from HACSB project-based voucher units. Currently assisted households who are selected from the 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 47% in year 1 of participation to 39% in year 5.

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

Subsidy Calculation:

The subsidy calculation mirrors the Streamlined Fixed Assistance Program for New Non-Elderly/Non-Disabled Households. Under that calculation, the household's rent share is the greatest of 36% of their gross income, the minimum rent, or baseline rent, for the duration of assistance.

Subsidy Limitation:

This component has not been implemented as of May 2024 but may be implemented in the future to ensure financial viability of the program without terminating assistance or serving fewer households. HACSB is authorized to apply a subsidy limitation to households participating in the TLA activity. To encourage households to select units that are appropriately sized and most likely to be affordable to the household when coupled with the rental subsidy, HACSB will apply a subsidy limitation to over-housed households. Over-housed households are those who have voluntarily selected and leased a unit that is larger than their voucher size. For example, a household with a two-bedroom voucher who has chosen to lease a three-bedroom unit is an over-housed household. In these instances, the rental subsidy is capped by the applicable HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the household, which results in a greater household rent share than if the household had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the maximum allowable amount. Through this activity, HACSB will limit the maximum subsidy for over-housed households to the average subsidy rate for households that are not over-housed with the same size voucher.

Supportive Services:

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

- Needs assessment at intake to identify barriers and areas of need, such as education, job training, childcare, transportation, and other areas;
- Development of an individualized action plan to overcome barriers and needs as identified;

- Access to other resources designed to provide the household with meaningful support and tools to enhance the household’s chances for success.

Mobility:

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

Hardship Exemptions:

HACSB recognizes that the expiration of assistance may present a hardship for some households and has developed hardship exemptions to the five-year term limit. A hardship exemption allows HACSB to provide an extension of assistance and is available in four categories:

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

To be eligible for a hardship exemption, the household must have complied with all requirements of the program, including the Supportive Services Agreement. Any approved extension(s) 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 extensions if sufficient funding is not available.

Total Term:

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

Unit Size Limitation:

HACSB may require households admitted to or moving to a new unit under the Term-Limited Assistance (TLA) Program to select a unit whose number of bedrooms is not greater than their voucher size. For example, a household with a two-bedroom voucher may not lease a three-bedroom or larger unit. The intent of this component is to ensure that households choose a unit that is appropriately sized and affordable for their income situation. Over-housed households are also more costly to house than households in right-sized units. HACSB implemented this requirement in July 2021, but withdrew the requirement in 2022 due to scarcity of available housing units. We continue to monitor and balance program costs with leasing success

to determine if re-implementation of the requirement is needed. We may implement the requirement again in the coming year to ensure the financial viability of the program without terminating assistance or serving fewer households.

Incentive to Move to Areas of High Opportunity:

HACSB may provide incentive to households 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 2026. We continue to monitor and balance program costs with leasing success to determine if implementation of this component is appropriate.

Post-Assistance Tracking Incentive:

HACSB has partnered with Loma Linda University (LLU) to evaluate Term-Limited Lease Assistance households at exit and annually for two years after assistance has concluded. Information is collected through a questionnaire that is returned directly to LLU. Although participation in the survey is voluntary, a monetary incentive is provided for households completing the survey. Households receive the incentive payment only upon completion of each survey. Feedback obtained through the exit study helps HACSB to understand the household perspective and experience in the TLA program.

Rent Increase Limitation:

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

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 22: Streamlined Lease Assistance

i. Plan Year Approved, Implemented, Amended

- FY 2013: Initial approval.
- FY 2015: Implemented February 1, 2015.
- FY 2016: Modified to add “Streamlined Fixed Lease Assistance for New Non-Elderly/Non-Disabled Households”.
- FY 2017: Modified to add a unit size limitation for tenant-based voucher programs.
- FY 2018: Modified the rent tiers for career-able families currently participating in the Streamlined Tiered Lease Assistance program from 21/24/27/30% to 30/33/36%.
- FY 2019: Modified the rent calculation for new elderly and 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 rent calculation for all elderly and disabled households admitted to the Streamlined Lease Assistance program to 30% of their gross income, and up to 36% if internal analysis demonstrates that it is necessary to ensure financial viability of the program.

ii. Description/Update

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

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

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

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

Streamlined Lease Assistance Program for Elderly/Disabled Households:

Households admitted prior to January 1, 2019: The household's rent share Total Tenant Payment (TTP) was the greatest of 24% of their gross income, the 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. Effective July 1, 2026, 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 the second year, effective July 1, 2027, will tier to 30% TTP calculation.

Households admitted on or after January 1, 2019: The household's rent share TTP is the greatest of 30% of their gross income, the minimum rent, or baseline rent (described below). This component was implemented for new households 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 Non-Elderly/Non-Disabled Households:

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

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

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

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

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

At Admission

Household Monthly Gross Income: \$1,000
Tier 2 Calculated Rent (30%): \$300 ← Household Rent Share
HACSB Minimum Rent: \$125
Baseline Rent: N/A

First Biennial Recertification

Household Monthly Gross Income: \$900
Tier 2 Calculated Rent (33%): \$297
HACSB Minimum Rent: \$125
Baseline Rent (Highest Prev. Rent): \$300 ← household Rent Share

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

This component previously utilized four rent tiers which set the household's rent share at 21%/24%/27%/30% of gross income, the minimum rent, or baseline rent. The rent tier structure was changed to the current three-tier structure through our FY 2018 Annual MTW Plan. Beginning February 1, 2018, all households were moved from their current tier to the new Tier 1 (30%) and received an automatic six-month hardship exemption which delayed any change in their rent portion. All households admitted since that time entered at the 30% rent tier.

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 non-elderly and non-disabled SLA households. 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 HACSB minimum rent, or the baseline rent.

Streamlined Lease Assistance Program for Special Admission 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. In FY 2027, if sufficient funding is available, HACSB plans to transfer Emergency Housing Program (EHV) households to the Housing Choice Voucher (HCV) Tenant Based Voucher (TBV) program. The rent calculation for former EHV households will be the greatest of 24% of their gross income, HACSB's minimum rent, or baseline rent. No other households are being, or are anticipated to be, enrolled under this rent calculation.

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

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

Subsidy Limitation:

This component is on hold and has not been implemented as of May 2024. HACSB is authorized to apply a subsidy limitation to households participating in the SLA activity. To encourage households to select units that are appropriately sized and most likely to be affordable to the family when coupled with the rental subsidy, HACSB intends to implement a subsidy limitation for over-housed households. These are households that have voluntarily selected and leased a unit that is larger than their voucher size. For example, a household with a two-bedroom voucher may choose to lease a three-bedroom unit. In these instances, the rental subsidy is capped by the HACSB Local Payment Standard. However, in many cases the contract rent for the larger unit exceeds the contract rent for a unit that is the same size as the voucher issued to the household, which results in a greater family rent share than if the household had selected a smaller unit. Additionally, this scenario increases the HAP subsidy, often to the

maximum allowable amount of HACSB's Local Payment Standard. Through this component, HACSB will limit the maximum subsidy for over-housed households to the average subsidy rate for households that are not over-housed with the same size voucher.

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

Rent Increase Limitation (voucher programs only):

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

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

Hardship Exemptions:

HACSB recognizes that under some circumstances, households may experience a hardship that makes it challenging to pay the applicable rent under the Streamlined Lease Assistance Program and has developed permanent and temporary hardship exemptions. A hardship exemption will provide a permanent or temporary adjustment to the households TTP to help maintain housing stability during a financial hardship.

Permanent Hardship Exemptions:

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

Temporary Hardship Exemptions:

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

If approved, the effective date of the hardship exemption 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.

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

- SLA households experiencing a significant loss of income due to the current crisis may be approved for a hardship exemption. This new hardship exemption category will follow the application, review, and approval policies and procedures currently in place for other hardship categories;
- Processing of interim recertifications (to the extent that HACSB processes interim recertifications for households served through the Moving to Work demonstration), with the exception of interims processed for an approved hardship exemption, will be deferred to the earliest practical and feasible date.

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

iii. Planned Non-Significant Changes

HACSB added language to clarify if sufficient funding is available, HACSB will transfer Emergency Housing Program (EHV) households to the Housing Choice Voucher (HCV) Tenant Based Voucher (TBV) program, of which at that time, the rent calculation for former EHV households will be the greatest of 24% of their gross income, HACSB’s minimum rent, or baseline rent.

iv. Planned Significant Changes

None.

Activity 23: No Child Left Unsheltered

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

- Through this activity, any combination of sixty (60) project-based vouchers and/or tenant-based vouchers are 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). Referred families may be admitted as a special admission or placed onto a waiting list with a preference specifically for this program. Participating families receive supportive services through HACSB partners, including the San Bernardino County Department of Behavioral Health (DBH).

Family Rent Portion and Rental Subsidy Calculation

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

Transition to Other HACSB Housing Programs

Our FY 2019 Annual MTW Plan, Amendment 1, included a modification to this activity to automatically transition eligible families to another HACSB housing program after two years of participation in NCLU. Career-able households will transition to the Term-Limited Lease Assistance (TLA) program and elderly/disabled households will transition to Streamlined Lease Assistance (SLA). This modification applies to new NCLU families admitted on or after October 1, 2019. 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.

In 2025, HACSB transitioned existing NCLU households, admitted to the program before October 1, 2019, residing in units where the PBV contract is expiring, to a tenant-based voucher. This did not have an impact on the households as they were not required to move from the unit and their rent portion continued to be calculated using the SLA methodology.

Foster Care Component

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

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

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

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

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

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

PBV Unit Designation

In March 2015, the HACSB Housing Commission and Board of Governors approved the award of the 40 project-based voucher units reserved for this activity to units within the HACSB-owned and HACSB-affiliated non-profit housing stock. These contracts were awarded through a non-competitive process authorized under HACSB's Local Project-Based Voucher program (activity #11). Families housed through this activity typically have significant challenges in locating housing through the traditional tenant-based voucher program. This award gives HACSB, as the property owner, the ability to house NCLU families more quickly and with more flexibility than in the traditional tenant-based voucher (TBV) program. As of FY 2026, HACSB has transitioned all NCLU households to TBV following the expiring of existing PBV contracts. HACSB will continue to monitor leasing outcomes for NCLU households and assess whether future PBV unit designations may be needed to support housing stability and leasing success.

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

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

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

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

Notices to Over-Income Households

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

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

Emergency Operations

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

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

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

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

i. Plan Year Approved, Implemented, Amended

- FY 2016: Initial approval.

ii. Description/Update

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

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

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

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

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

In 2015 HPI broke ground on the Horizons at Yucaipa development, and construction of Phase I was completed in the spring of 2017. The phase achieved full lease-up and full occupancy by May 2017.

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 26: Local Disaster Short-Term Rental Assistance Program

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

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

Determination of Local Disaster

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

Wait List

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

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

Eligibility

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

Term of Assistance

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

Subsidy Calculation and Reexamination

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

Leveraging of Resources

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

HAP Contract and Lease

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

Portability

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

Subject to Availability

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

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

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

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

Implementation – Crestview Terrace

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

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

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

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

HACSB Subsidy and Income Band TTP Calculation – Type One

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

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

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

In FY 2026, HACSB applied the Type One rent calculation to the new development, Valencia Grove Phase II, and plans to apply this calculation to Arrowhead Grove Phase IV, which is currently under construction.

HACSB Subsidy and Income Band TTP Calculation – Type Two

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

The TTP and HAP subsidy are set as follows:

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

Hardship Case Criteria

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

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

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

A hardship exemption may be approved for the following reasons:

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

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

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

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

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

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

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 28: Leasing Success Strategies

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

Signing Bonus

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

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

The following properties are not eligible for the signing bonus:

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

The following situations do not qualify for a signing bonus:

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

Housing Navigation and Other Supportive Services

HACSB uses MTW single-fund flexibility to fund housing navigation and other supportive services to tenant-based voucher program customers to support leasing success. This strategy is a temporary service and is anticipated to be in place for no more than 1-2 years to support leasing efforts during this extremely challenging time. Housing navigation and supportive services will be offered only to households newly entering HACSB's tenant-

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

Activity 29: Moving On Strategy

i. Plan Year Approved, Implemented, Amended

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

ii. Description/Update

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

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

Household Selection and Transition

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

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

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

Rent and Subsidy Determination

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

Other Applicable MTW Activities

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

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

iii. Planned Non-Significant Changes

None.

iv. Planned Significant Changes

None.

B. Not Yet Implemented Activities

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

C. Activities on Hold

HACSB does not have any activities that are approved and on hold.

D. Closed Out Activities

Activity 1: Single Fund Budget

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

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

ii. Reason(s) for Close-Out

The activity was 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. Plan Year Approved, Implemented, Amended, and Closed Out

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

ii. Reason(s) for Close-Out

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

Activity 3: Alternate Assessment Programs

i. Description

This activity was approved through HACSB's FY 2009 Annual MTW Plan and was never implemented. This activity was closed out through HACSB's FY 2026 MTW Plan.

ii. Reason(s) for Close-Out

This activity was closed out, as it had previously been designated "on hold". HACSB had planned to implement an MTW-wide assessment system initiated by the MTW Collaborative; however, the system remained incomplete as of 2021.

Activity 6: Elimination of Assets

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

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

ii. Reason(s) for Close-Out

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

Activity 7: Controlled Program Moves

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

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

ii. Reason(s) for Close-Out

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

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

Activity 9: Elimination of Earned Income Disallowance

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

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

ii. Reason(s) for Close-Out

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

Activity 15: Pilot Work Requirement

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

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

ii. Reason(s) for Close-Out

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

Activity 16: Operating Subsidy for Vista del Sol

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

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

ii. Reason(s) for Close-Out

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

Activity 17: Local Income Inclusions

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

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

ii. Reason(s) for Close-Out

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

Activity 19: Local Family Self-Sufficiency Program

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

This activity was approved in our FY 2011 MTW Annual Plan and implemented on July 1, 2012. This activity was closed out 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 program participants who were eligible to receive the balance of their escrow account at the end of their FSS contract if they voluntarily terminated their assistance from the Housing Choice Voucher or Public Housing program due to self-sufficiency efforts. Families were also allowed to withdraw a portion of their FSS escrow savings balance during participation in the Local FSS program for certain self-sufficiency-related activities. However, this program experienced low enrollment year after year as interested participants opted to instead enroll in HACSB's traditional FSS program. HACSB plans to develop and propose a revised Local FSS MTW activity in the future.

Activity 21: Utility Allowance Reform

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

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

ii. Reason(s) for Close-Out

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

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

Activity 30: Valencia Grove Phase II, Affordable Rent Strategy

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

This activity was approved in our FY 2024 Annual MTW Plan. This activity was never implemented. This activity was closed out 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. HACSB will convert this property through HUD’s Restore-Rebuild initiative, formally known as “Faircloth-to RAD”, therefore Activity 30 is no longer necessary.

V. Sources and Uses of MTW Funds

A. Estimated Sources and Uses of MTW Funds

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

i. Estimated Sources of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	Total Tenant Revenue	7,104
70600	HUD PHA Operating Grants	159,000,110
70610	Capital Grants	-
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	29,942,726
71100+72000	Investment Income	417,659
71600	Gain or Loss on Sale of Capital Assets	-
71200+71300+71310+71400+71500	Other Income	30,000
70000	TOTAL REVENUE	189,397,599

ii. Estimated Uses of MTW Funds

FDS LINE ITEM NUMBER	FDS LINE ITEM NAME	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	15,009,561
91300+91310+92000	Management Fee Expense	1,320
91810	Allocated Overhead	-
92500 (92100+92200+92300+92400)	Total Tenant Services	63,625
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	109,588
93500+93700	Labor	18,172
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	889,679
95000 (95100+95200+95300+95500)	Total Protective Services	-
96100 (96110+96120+96130+96140)	Total Insurance Premiums	23,570
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	282,306
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	-
97100+97200	Total Extraordinary Maintenance	-
97300+97350	Housing Assistance Payments + HAP Portability-In	172,999,778
97400	Depreciation Expense	-
97500+97600+97700+97800	All Other Expenses	-
90000	TOTAL EXPENSES	189,397,599

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

iii. Description of Planned Use of MTW Single Fund Flexibility

DESCRIPTION OF PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

1. HACSB's Family Empowerment Services department (FES) and its services, which are not a separate MTW activity, are funded using single fund flexibility.
2. 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.
3. 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.
4. 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.
5. Single-fund flexibility may be utilized to support expenses for RAD-converted developments, including, but not limited to, mandated reserve contributions.
6. Single-fund flexibility is crucial to HACSB's affordable housing development efforts. By leveraging multiple internal sources (Capital Fund, Replacement Housing Factor (RHF) funding, Voucher funding), HACSB maximizes funding from private sources and 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.
7. HACSB will utilize single-fund flexibility to support the acquisition of rental housing properties, in conjunction with commitment of project-based vouchers (PBV) to the site.
8. In FYE 2026 Q4 HACSB anticipates beginning redevelopment of an existing warehouse building and the adjacent parking to develop a community resource center (CRC) in the city of San Bernardino at Arrowhead Grove. The CRC will provide customers access to HACSB services, including assistance with housing-related needs, self-sufficiency resources, and other services offered by community partners. HACSB will use single-fund flexibility to support the development of the CRC. The Arrowhead Grove community is RAD-converted former public housing site with currently 322 affordable housing units onsite.
9. HACSB's Activity 28: Leasing Success Strategies is funded through single-fund flexibility.

iv. Planned Application of Unspent Operating Fund and HCV Funding

Original Funding Source	Beginning of FY – Unspent Balances	Planned Application of Unspent Funds during FY**
HCV HAP	\$46,204,450*	\$46,204,450
HCV Admin Fee	\$11,890,250	\$11,890,250
PH Operating Subsidy	\$4,731,484	\$4,731,484
Total:	\$62,826,184	\$62,826,184

*HUD-held reserves are funds retained by HUD for future eligible use by a housing authority, rather than funds currently held in the housing authority’s own accounts.

**At the time of this writing, HACSB is in the process of finalizing the planned application of unspent funds during the fiscal year. This table will be updated in the final draft presented to HACSB’s Board of Commissioners for approval.

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding

HACSB plans to utilize unspent Housing Choice Voucher (HCV) Housing Assistance Payments (HAP) balances on HAP for FY 2026-2027. Over the past several years HACSB has experienced significant increases in HAP costs for families in the HCV program. The increases are primarily driven by substantial and rapid increases in market rents and, consequently, HAP expenses will continue to outpace funding. In FY 2027, HACSB plans to draw upon funding reserves to cover monthly HAP expenses that exceed our monthly funding amount. HACSB also plans to apply the unspent Public Housing Operating Subsidy at Arrowhead Grove affordable housing development’s community resource center.

B. Local Asset Management Plan

i. Is the MTW PHA allocating costs within statute?

No.

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

Yes.

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

Yes.

iv. If the MTW PHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in the Plan Year or state that the MTW PHA does not plan to make any changes in the Plan Year.

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

C. Rental Assistance Demonstration (RAD) Participation

i. Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
HACSB has converted its entire Public Housing portfolio under the RAD program in accordance with HUD approvals. All units save one single family home have been converted to RAD project-based vouchers (PBV).

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

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

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

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

VI. Administrative

A. Board Resolution and Certification of Compliance

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

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

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B. Documentation of Public Process

This section includes a detailed timeline of the public process for this Annual Moving to Work (MTW) Plan and a summary transcript of any public comment(s) received during the public process. A copy of the Notice of Public Hearing for this Annual MTW Plan is included. The purpose of the hearing is to provide interested parties with an opportunity to present questions and/or comments regarding HACSB’s Fiscal Year 2026-2027 Annual Moving to Work Plan before submission to the Housing Authority’s Board of Commissioners and HUD for approval.

SUMMARY OF PUBLIC PROCESS	
DATE	ACTION
June 1, 2026	Public comment period open. Annual MTW Plan posted on the HACSB website and made available for review at all HACSB offices.
June 1 – 4, 2026	A Notice of Public Hearing regarding the Annual MTW Plan, including the dates/times of public hearing(s) and the public comment period, published in the following local newspapers: <ol style="list-style-type: none"> 1. San Bernardino County Sun 2. Black Voice 3. El Chicano 4. Inland Valley Daily Bulletin 5. Precinct Reporter 6. Daily Press 7. The Press Enterprise
June 16, 2026, and June 17, 2026	Public hearings at HACSB’s Administrative Office.
June 9, 2026	Preview of the Annual MTW Plan presented to HACSB’s Board of Commissioners through a Board Building presentation during the regular meeting.
June 30, 2026	Public comment period closed.
July 14, 2026	Presentation of the Annual MTW Plan to the HACSB Board of Commissioners for recommended approval.

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C. Planned and Ongoing Evaluations

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

1. **Moving On Strategy (Activity 29):** A new study will be conducted by LLU for the Moving on Strategy in FY 2026. The Moving On Strategy was approved through our FY 2023 MTW Plan and implemented in September 2023. The Moving On Strategy serves individuals that have voluntarily transitioned out of the Continuum of Care (CoC) – formerly known as Shelter Plus Care – with light supportive services provided by the San Bernardino County Department of Behavioral Health (DBH). The 2026 report will explore if participants are successful in maintaining stability after transitioning from CoC to Moving On and will establish baseline values to be used for future evaluation.
2. **Emergency Housing Voucher (EHV) Program:** HACSB is working with LLU to evaluate outcomes of the Emergency Housing Voucher program administered by HACSB. The EHV program was created by Congress in 2021 as a temporary program to assist individuals and families experiencing housing instability. While the program was originally expected to operate through 2030, the U.S. Department of Housing and Urban Development (HUD) has informed housing authorities nationwide that EHV funding is being depleted more quickly than anticipated, and the program will end when funding runs out. A preliminary report of the first customers to join the HACSB EHV program was prepared in 2022 and identified common barriers of EHV customers searching for housing. With the announcement by HUD that EHV will be ending sooner than originally expected due to exhaustion of funding, LLU is preparing a second report that aims to assess how families and landlords are impacted by the program's early termination. This report will incorporate the assessment and outcome measurements of the Self-Sufficiency Matrix (SSM), a case management tool developed by HUD to give insight into areas of high risk/need and areas of low risk/self-sufficiency to assess an individual's ability to meet their basic needs without public assistance. The incorporation of the SSM will establish a baseline that will be used for comparison in future evaluations. This report will also include feedback provided by HACSB staff that work closely with EHV participants and by service provider partners that originally referred individuals to HACSB for housing assistance through EHV and also provided ongoing support. An additional post-assistance report is also being planned for 2027 that will assess the stability of participants after the EHV program has ended.
3. **Term-Limited Lease Assistance (TLA) Program (Activity 20):** A longitudinal study of this initiative performed by LLU began in 2012 and is ongoing. The study follows participating households through their progress from initial lease-up through the end of rental assistance through the TLA program. In FY 2017, HACSB implemented an additional component to monitor the self-sufficiency related progress of households for up to two years after commencement of housing assistance through a voluntary survey process. In FY 2023 the longitudinal study was updated to incorporate the assessment and outcome measurements of the Self-Sufficiency Matrix (SSM), a case management tool developed by HUD to give insight into areas of high risk/need and areas of low risk/self-sufficiency to assess an individual's ability to meet their basic needs without public assistance. This tool has been incorporated into several evaluations conducted by LLU of HACSB MTW activities. In FY 2024, LLU used the SSM to measure family outcomes during the program and for up to two years after a family left the program. This evaluation also highlighted a positive

correlation between EHV participants increasing earned income while relying less on assisted income. The next report from this study is scheduled to be completed in FY 2026.

4. **2. Permanent Supportive Housing:** HACSB has partnered with LLU for evaluation of our two permanent supportive housing (PSH) developments for homeless and chronically homeless individuals and families: Golden Apartments in San Bernardino and Desert Haven Apartments in Victorville. Families in these two developments are served through MTW project-based vouchers. Golden Apartments opened in early 2020, and LLU provided a baseline/benchmark report of the first families to reside there in FY 2021. In FY 2024, a second report utilized the Self-Sufficiency Matrix (SSM) assessment tool and HACSB administrative data to assess residents' needs in eighteen domains, including education, employment, housing, health care, mental health, transportation, family relations, substance abuse, and others. The study found that residents' areas of highest need were related to physiological needs and safety, such as food and housing security, and mental/physical healthcare and employment. The study also found that the supportive services provided to residents through community partners to augment the housing assistance and help ensure a successful transition to stable, long-term housing, has been vital to the success of the development. The report provided recommendations to HACSB, including: continuing to focus on meeting residents' basic needs; continuing to provide access to mental health and substance abuse services and evaluating whether additional support in these areas are needed; and focusing on the overall stabilization of the Golden Apartments and Desert Haven Apartments residents and communities rather than expanding PSH efforts. Evaluation will continue for these two sites. The next report from this study is scheduled for FY 2027.
5. **No Child Left Unsheltered (NCLU) (Activity 23):** A longitudinal study of this activity began in 2015 to identify effects on participating families. The evaluation is ongoing, and focuses on family safety and stability, physical and mental health of adults and children, school attendance of children, employment, income, education advancement, self-sufficiency activities, financial choices, use of resources, and other effects on children. The reports and recommendations provided by LLU based upon the evaluation have informed HACSB's policy decisions regarding the NCLU activity, especially the enhancements and modifications made through HACSB's FY 2019 MTW Annual Plan.
6. **Other Activities:** HACSB also intends to partner with LLU for evaluations of future MTW activities that are in development, including a potential New Rent Reform Activity.

D. Lobbying Disclosures

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

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Appendices

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

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Appendix B. Local Asset Management Plan (LAMP)

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

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

Information Technology (IT) – Formerly referred to as Information Services, our centralized IT department is responsible for the network and server administration, database and software administration, telecommunications and report developments for the entire agency and affiliated partners. This is done with a dedicated team of five individuals that support 330 agency computers in 42 locations throughout our county. They respond to an average of 180 help desk tickets per month that result in around 20 site visits per month.

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

and chronically individuals and families. Additionally, the Policy and Communications team coordinates the processes for submission of items to our Board of Commissioners for review and approval.

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

Development – Our centralized Real Estate Development team is responsible for all Real Estate acquisition, rehabilitation, redevelopment, and new construction projects. Our dedicated project managers often eliminate the costs associated with outside development and/or construction management consultants. The staff is continuously available to HACSB’s in-house property management teams as a technical, as well as planning and implementation resource for non-routine maintenance and emergency rehabilitation projects. The Development department also assists property management in the completion of all Physical Needs Assessments and due diligence reports for the entire portfolio of HACSB residential developments. This department also either directly oversees or assists in all of the Capital Fund improvement and rehabilitation projects within the public housing or RAD converted housing portfolios and administers all grant funding and debt financing that can be associated. The development team led the implementation of HACSB’s first Permanent Supportive Housing sites for homeless and chronically homeless individuals and families. They also continue overseeing the ongoing major revitalization of HACSB’s oldest public housing sites in Redlands (Formerly Redlands-Lugonia, now known as Valencia Grove) and San Bernardino (formerly Waterman Gardens, now known as Arrowhead Grove). Finally, HACSB administers a very successful homeownership program that has helped over 266 low-income families overcome barriers and achieve homeownership. The Homeownership program utilizes a variety of methods to aid participants on their path to homeownership, including Section 32 (converted public housing), Section 8 Homeownership, and a Community Land Trust.

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

Local Asset Management Implementation

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

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

HACSB has been operating under project-based budgeting and accounting practices since 2006. We have developed systems and reports to facilitate the onsite management and analysis of budgets, expenses, rent collection and receivables, and purchasing. In accordance with HUD Asset

Management guidance, HACSB decentralized its maintenance program in 2008 and each AMP was assigned maintenance personnel, depending on the size and maintenance requirements of the properties in the AMP. HACSB has a decentralized purchasing model for the acquisition of goods. Sites staff use a simple purchasing system that enables them to be able to purchase goods directly from their pool of vendors while still enabling management staff to track spending habits. While the acquisition of goods is decentralized, the agency has adopted a hybrid approach to the acquisition of its services. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with procurement staff to define scopes of work, and ensuring the work is done properly.

Cost Allocation Approach - Under 2 CFR Part 200.412 , there is no universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, either as a direct or an indirect cost. Consistent with OMB Circular A-87 cost principles, HACSB has identified all of its direct costs and segregated all its costs into pools, as either a direct or an indirect cost pool.

Direct Costs – 2 CFR Part 200.413(a) defines direct costs as follows: Direct costs are those that can be identified specifically with a particular final cost objective. HACSB’s direct costs include, but are not limited to:

- Contract costs readily identifiable with delivering housing assistance to low-income families
- Housing Assistance Payments, including utility allowances, for vouchers
- Utilities
- Insurance
- Property-based audits
- Staff training
- Interest expense
- Information technology fees
- Portability administrative fees
- Rental Assistance department costs for administering Housing Choice Vouchers including inspection activities
- Operating costs directly attributable to operating HACSB-owned properties
- Fleet management fees
- Maintenance services for unit or property repairs or maintenance
- Maintenance services include, but are not limited to, landscaping, pest control, decorating and unit turnover
- Community Services department costs directly attributable to tenant services
- Gap financing real estate transactions

- Acquisition costs
- Demolition, relocation and leasing incentive fees in repositioning HACSB-owned real estate
- Homeownership activities for low-income families
- Leasing incentive fees
- Certain legal expenses
- Professional services at or on behalf of properties or a portfolio, including security services
- Extraordinary site work
- Any other activities that can be readily identifiable with delivering housing assistance to low-income families
- Any cost identified for which a grant award is made. Such costs will be determined as HACSB receives grants

Indirect Costs – 2 CFR Part 200.56 defines indirect costs as those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. HACSB’s indirect costs include, but are not limited to:

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

Indirect Services Fees - HACSB has established Indirect Services Fees based on anticipated indirect costs for the fiscal year. Any indirect costs incurred by HACSB in support of its projects and programs will be incurred by the central administrative structure and charged out to the programs in the form of a fee. The three fees are:

- Asset Management Fees
- Management Fees
- Bookkeeping Fees

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

Management Fees – The central administrative structure will continue to charge the Management Fee at the HUD’s determined rate of \$108.41 per units leased to the AMPS and 20% of Administrative Fees for Housing Choice Voucher program.

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

Per the requirements of 2 CFR 200.414, the indirect services fees are determined in a reasonable and consistent manner based on total units and/or leased vouchers. The fees are calculated as a per-housing-unit or per-leased-voucher per month charged to each program. HACSB will annually review all of its indirect service fees charges in relation to actual indirect costs and will incorporate appropriate adjustments in indirect service fees for the subsequent year, based on this analysis.

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

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

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

Appendix C. Existing Project-Based Vouchers

This table shows the list of project-based vouchers, including Rental Assistance Demonstration (RAD) project-based vouchers in place at the beginning of FY 2027. This table includes project-based vouchers that have been awarded (committed) or are leased/issued.

Property Name	Number of MTW PBVs	Planned Status at End of Plan Year	RAD?	Description of Project	City
Andalusia	17	Leased/Issued	No	Supportive Housing Units	Victorville
Arrowhead Grove Phase I - Valencia Vista	75	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Arrowhead Grove Phase II - Olive Meadows	61	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Arrowhead Grove Phase III - Crestview Terrace	116	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Arrowhead Woods	50	Leased/Issued	No	Affordable Senior Community	San Bernardino
Barstow - 7th Street	74	Leased/Issued	Yes	Affordable Family Community	Barstow
Barstow - Bighorn	70	Leased/Issued	Yes	Affordable Family Community	Barstow
Barstow - Deseret	15	Leased/Issued	Yes	Affordable Family Community	Barstow
Barstow - Williams	40	Leased/Issued	Yes	Affordable Senior Community	Barstow
Barstow - Yosemite	18	Leased/Issued	Yes	Affordable Family Community	Barstow
Bloomington Phase I	11	Leased/Issued	No	Affordable Family & Senior Community	Bloomington
Bloomington Phase II	20	Leased/Issued	No	Affordable Family Community	Bloomington
Bloomington Phase III	20	Leased/Issued	No	Supportive Housing for Chronically Homeless	Bloomington
Chino - Monte Vista	50	Leased/Issued	Yes	Affordable Family Community	Chino
Colton - Parkview Pines	85	Leased/Issued	Yes	Affordable Family Community	Colton
Colton - Mt. Vernon Manor	39	Leased/Issued	Yes	Affordable Senior Community	Colton
Day Creek Villas	8	Leased/Issued	No	Affordable Senior Community	Rancho Cucamonga
Desert Haven Apartments	31	Leased/Issued	No	Supportive Housing for Chronically Homeless	Victorville
Desert Village	46	Leased/Issued	No	Affordable Senior Community	Victorville
Golden Apartments	38	Leased/Issued	No	Supportive Housing for Chronically Homeless	San Bernardino
Grandview Towers	39	Leased/Issued	No	Affordable Senior Community	Twin Peaks
Highland - 9th Street	12	Leased/Issued	Yes	Affordable Family Community	Highland
Horizons at Yucaipa	49	Leased/Issued	No	Senior Community with Supportive Housing Units	Yucaipa

Property Name	Number of MTW PBVs	Planned Status at End of Plan Year	RAD?	Description of Project	City
Housing Partners I Scattered Site Units	64	Leased/Issued	No	Affordable Family Communities	Various
Ivy at College Park	8	Leased/Issued	No	Affordable Family Community	Chino
Las Terrazas	9	Leased/Issued	No	Supportive Housing for Chronically Homeless	Colton
Los Olivos	98	Leased/Issued	Yes	Affordable Family Community	Upland
Maplewood Homes	296	Leased/Issued	Yes	Affordable Family Community	San Bernardino
Maplewood Scattered Sites	34	Leased/Issued	Yes	Affordable Family Communities	San Bernardino
Meadowbrook	47	Leased/Issued	No	Affordable Senior Community	San Bernardino
Mentone Clusters	33	Leased/Issued	No	Affordable Family Community	Mentone
Metro View (formerly Rialto Metrolink)	8	Leased/Issued	No	Affordable Family Community	Rialto
Northgate Village	12	Leased/Issued	No	Veteran Housing Units	Victorville
Northport Apartments	29	Leased/Issued	No	Affordable Family Community	Victorville
Redlands - Brockton	75	Leased/Issued	Yes	Affordable Family Community	Redlands
Redwood Terrace	68	Leased/Issued	No	Affordable Senior Community	Fontana
Robert O. Townsend	47	Leased/Issued	No	Affordable Senior Community	Montclair
Rosena Fountains	8	Leased/Issued	No	Affordable Family Community	Fontana
Scattered Sites Affordable Portfolio LLC	236	Leased/Issued	No	Affordable Family Communities	Various
Sunrise Vista	79	Leased/Issued	No	Affordable Family Community	Barstow
Sunset Pointe	70	Leased/Issued	No	Affordable Family Community	Barstow
Valencia Grove Phase I	85	Leased/Issued	No	Affordable Family Community	Redlands
Valencia Grove Phase II	103	Leased/Issued	Yes	Affordable Family Community	Redlands
Vista del Sol	53	Leased/Issued	No	Affordable Senior Community	Redlands
Waterman Scattered Sites	97	Leased/Issued	Yes	Affordable Family Communities	San Bernardino
Yucaipa Crest	45	Leased/Issued	No	Affordable Senior Community	Yucaipa
Total MTW PBV	2,588				

Property Name	Number of Non-MTW PBVs	Planned Status at End of Plan Year	RAD?	Description of Project	City
29 Palms VASH	3	Leased/Issued	No	Veteran Supportive Housing	29 Palms
Gateway Scattered Sites	18	Leased/Issued	No	Continuum of Care Supportive Housing	Ontario
HOPWA PBV	12	Leased/Issued	No	HOPWA Supportive Housing	San Bernardino
Laurelbrook Scattered Sites	27	Leased/Issued	No	Continuum of Care Supportive Housing	Various
Lanternwoods Scattered Sites	16	Leased/Issued	No	Continuum of Care Supportive Housing	Various
Liberty Lane	55	Leased/Issued	No	Veteran Supportive Housing	Redlands
Loma Linda Veterans Village	50	Leased/Issued	No	Veteran Supportive Housing	Loma Linda
Total Non-MTW PBV	181				

Appendix D. Non-Moving to Work Information

Special Purpose Programs

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

PROGRAM TITLE	POPULATION SERVED	FAMILIES SERVED <i>AS OF MAY 2026</i>
Housing Opportunities for Persons with AIDS (HOPWA)	HACSB has partnered with Foothill Aids Project to offer tenant-based and project-based rental assistance and supportive services to persons diagnosed with HIV/AIDS. The Foothill AIDS Project assesses the applicant’s duration of participation in their case management program and facilitates location of suitable housing to meet their clients’ needs.	74
Veteran’s Affairs Supportive Housing (VASH)	HACSB and Veterans Administration Medical Center have partnered to provide tenant-based and project-based vouchers and supportive services to eligible homeless veterans with severe psychiatric or substance abuse disorders. The program goals include promoting Veteran recovery and independence to sustain permanent housing.	474
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.	7
Emergency Housing Voucher (EHV) Program	The EHV program is a temporary federal rental assistance program that program provides tenant-based rental assistance to low-income individuals and families who are homeless, at risk of homelessness, fleeing domestic violence or human trafficking, or recently homeless and at high risk of housing instability through vouchers funded by the American Rescue Plan Act of 2021. EHV helps individuals and families locate rental housing and provides financial assistance to make their rent affordable. HACSB was authorized to serve up to 455 households in this program. This program is ending nationwide in 2026 due to discontinuation of federal funding.	366

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 MAY 2026</i>
Laurelbrook Estates	This program assists individuals or families who are chronically homeless and is a Continuum of Care project-based voucher subsidy tied to designated scattered sites throughout the County of San Bernardino. The supportive services are offered through the Department of Behavioral Health.	25
Project Gateway	HACSB formed a partnership with Ontario Housing Authority, Mercy House Living Centers Inc., and the San Bernardino County Department of Behavioral Health (DBH) to provide permanent housing in conjunction with long-term supportive services including mental health care, employment, self-sufficiency etc. to individuals and families who are chronically homeless in our community.	12
Cornerstone	This program was initially implemented in 2012 and provides rental assistance for hard to serve chronically homeless individuals and families with disabilities in connection with supportive services funded through the Department of Behavioral Health (DBH). As of March 1, 2023, three existing tenant-based Continuum of Care programs (New Horizons, Whispering Pines and Stepping Stones) have all been consolidated into the Cornerstone Program. This is an ongoing program, and all turnover vouchers focus on providing housing to chronically homeless households. HACSB provides the housing services based on eligible referrals from the CES and the DBH, matches housing funds by providing supportive services.	205
Lantern Woods	This program was implemented in 2012 and is a Continuum of Care project-based voucher subsidy tied to designated sites in the County of San Bernardino. The supportive services are offered through the DBH for chronically homeless individuals and families.	16

HACSB Scholarship Program

Since 1991, the Housing Authority has been proud to assist eligible participants in achieving their higher educational goals through scholarships. To date, HACSB has awarded 373 students with \$308,500 in scholarships. Current participants/residents in Housing Choice Voucher programs, Public Housing programs, or other HACSB affordable housing communities are eligible to apply. Students need to be accepted by or currently attending a four-year college/university, community college, or technical/vocational school. Students attending a four-year college or university receive a \$1,500 scholarship while community college and technical/vocational school students receive a \$750 scholarship. The Housing Authority uses non-public funds to support this program promoting educational success. During the spring of 2026 HACSB began accepting applications for the HACSB Scholarship Program and anticipates awarding scholarships to several current participants/residents from our various programs in the summer of 2026.

Knowledge & Education for Your Success (KEYS)

KEYS is a 501(c)(3) nonprofit corporation established in 2009 by HACSB to consolidate HACSB's supportive services, centralize strategic community partnership development, and expand support for economically disadvantaged families and children. The creation of KEYS provided a unique opportunity to leverage non-traditional, non-Public Housing Authority funding sources to support HACSB participants while also expanding services to non-HACSB residents through homeless assistance and prevention resources. This work aligns with HACSB's mission of empowering individuals and families in need to achieve an enriched quality of life by providing housing opportunities and resources throughout San Bernardino County.

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

Over the past fiscal year, KEYS has continued focusing on some of the county's families with the greatest needs. Since January 2015, KEYS has partnered with HACSB and the San Bernardino County Transitional Assistance Department (TAD) to administer the Housing Support Program (HSP), a Rapid Rehousing program based on national best practices that helps eligible homeless families with children quickly transition into permanent housing. Building on HSP, KEYS launched two additional Rapid Rehousing programs, Keys for Success (KFS) and Keys for Life (KFL), through the U.S. Department of Housing and Urban Development's Continuum of Care. These programs serve homeless individuals and families in need of housing assistance and intensive case management for up to 24 months.

KEYS has drawn on its experience administering the Supportive Services for Veterans and Families (SSVF) program and providing housing navigation services to rapidly identify and secure permanent housing for KFS and KFL participants. To support long-term stabilization, KEYS uses its Family Strengthening casework model to ensure families have the resources and tools necessary to maintain housing stability and increase economic independence throughout the duration of program assistance.

KEYS continues to implement a collective impact strategy aligned with countywide efforts to address homelessness. Together, HACSB and KEYS focus on community impact strategies that support individuals and families experiencing or at risk of homelessness by connecting vulnerable populations to services throughout the county’s homeless services network. These efforts contribute to increased housing stability and self-sufficiency among community members.

Other Affordable Rental Housing

Affiliate Non-Profit – Housing Partners I, Inc. (HPI, Inc.) was created in 1991 to assist in the development of affordable housing as an affiliate non-profit of HACSB. HPI, Inc.’s designation as a Community Housing Development Organization (CHDO) allows it to apply for and receive set-aside Home Investment Partnerships Program (HOME) funds from San Bernardino County’s Department of Community Development and Housing and other cities for the acquisition, development, and rehabilitation of housing units. With over 35 years of housing development experience behind it, HPI, Inc. provides HACSB the means to leverage a variety of public and private funding sources to continue to increase the supply of affordable housing throughout the county of San Bernardino. Through the leveraging of HPI, a large number of affordable housing units have been created, owned and operated in the County. These units are shown in the following table.

PROPERTY NAME	CITY	UNITS	ENTITY
Scattered Sites – Region 1	Loma Linda, Redlands, Yucaipa, Bloomington, Colton, Fontana, Rancho Cucamonga	97	Scattered Affordable Portfolio, LLC
Scattered Sites – Region 2	Ontario, Montclair, Chino	107	Scattered Affordable Portfolio, LLC
Scattered Sites – Region 3	Adelanto, Apple Valley, Hesperia, Victorville, Joshua Tree, 29 Palms, Yucca Valley	131	Scattered Affordable Portfolio, LLC
Acacia Property	Fontana	28	HPI Property Acquisition LLC
Desert Village	Victorville	46	HPI Property Acquisition LLC
Kendall Drive Apts.	San Bernardino	37	HPI Property Acquisition LLC
Robert Townsend	Montclair	48	HPI Property Acquisition LLC
Kendall Park Apts.	San Bernardino	52	HPI Property Acquisition LLC
Valenica Grove I	Redlands	85	Redlands Valencia Grove I Associates, L.P.
Valencia Grove II	Redlands	104	Redlands Valencia Grove II Associates, LLC

PROPERTY NAME	CITY	UNITS	ENTITY
Desert Haven	Victorville	31	Desert Haven Victorville, L.P.
Golden Apt.	San Bernardino	38	Golden Apartments San Bernardino, L.P.
Horizons at Yucaipa	Yucaipa	50	UHC 00539 Yucaipa, L.P.

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

Appendix E. Fact Sheets

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

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

WHO WE ARE



Housing Authority of the
County of San Bernardino
Building Opportunities Together

As the largest provider of affordable housing in San Bernardino County and one of the most progressive housing authorities in the country, the Housing Authority of the County of San Bernardino (HACSB) proudly serves over 27,600 people, most of whom are seniors, veterans, individuals with disabilities, and families with children.

OUR MISSION

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

OUR VISION

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



Moving to Work

In 2008, Congress designated HACSB as a Moving to Work (MTW) agency. This designation allows HACSB to waive some program requirements in order to implement local policies targeting the three statutory objectives of the MTW demonstration: 1) Save taxpayer dollars through efficient work; 2) Promote economic independence among our customers; and 3) Promote housing choice.



Housing Families

We assist low-income households in attaining safe and stable housing through a variety of rental assistance programs funded by the U.S. Department of Housing and Urban Development (HUD). More than 11,300 households are served through housing assistance payments made to landlords on behalf of the families or by leasing housing owned and managed by HACSB. These programs provide a critical safety net for households in San Bernardino County, where a family would need to earn over three times the minimum wage to afford rent for a two-bedroom apartment. HACSB also owns and manages affordable rental communities that are not federally funded, bringing additional affordable housing opportunities to our communities in addition to the traditional rental assistance programs we administer.

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



191,000

applications across various waiting lists



11,350

families housed



1.3%

27,600

individuals housed, making up 1.3% of the county's population



4,500

seniors 62 years & older housed



2,100

homeless individuals & families served



9,000

individuals with disabilities housed



700

veteran families housed



\$308,500

in scholarships awarded to over 368 recipients since 1991



284

program participants have become new homeowners since 2000



56%

of households in our Family Self-Sufficiency Program increased their income by an average of \$27,398



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

NO.	DESCRIPTION	STATUTORY OBJECTIVE	PLAN YEAR	STATUS
25	Project-Based Voucher Flexibility for Horizons at Yucaipa Senior Housing	Expanding Housing Opportunities	FY 2016	Implemented
26	Local Disaster Short-Term Rental Assistance	Expanding Housing Opportunities	FY 2017 Amendment 1	Implemented
27	Local Project-Based Voucher Subsidy for Developments Using Tax Credit Rents	Expanding Housing Opportunities	FY 2019 Amendment 2	Implemented
28	Leasing Success Strategies	Expanding Housing Opportunities	FY 2022 Amendment 1	Implemented
29	Moving On Strategy	Expanding Housing Opportunities	FY 2023	Implemented
30	Valencia Grove Phase II, Affordable Rent Strategy	Expanding Housing Opportunities	FY 2024	Closed Out