

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

SAN FRANCISCO HOUSING AUTHORITY

**Five Year Plan
2016-2021**



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Executive Summary of the Five Year Plan

[24 CFR Part 903.7 9 (r)]

The San Francisco Housing Authority (SFHA) has prepared the following Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 and the ensuing HUD requirements. This Five-Year Plan is updated annually. Listed below are some of the primary goals that the SFHA currently plans to pursue based on its Five-Year Plan:

- Expand the supply of assisted housing
- Improve the quality of assisted housing
- Increase assisted housing choices

The SFHA's Five Year Plan is based on the premise that accomplishing the above five-year goals and objectives will move the SFHA in a direction consistent with its mission. The ability of the SFHA to accomplish the above goals will be dependent on appropriate funding from the U.S. Congress and HUD that is commensurate with regulations that the SFHA must meet. The plans, statements, budget summary, policies, etc. set forth in this Annual Plan all lead towards the accomplishment of the SFHA's goals and objectives. Taken as a whole, they outline a comprehensive approach towards the SFHA's goals and objectives. Below are a few highlights from the SFHA's Five Year Plan:

- Updates to the SFHA's Admissions and Continued Occupancy Policy;
- Updates to the SFHA's Housing Choice Voucher/Section 8 Administrative Plan;
- An emphasis on public housing revitalization and redevelopment; and
- Profile of current SFHA resources.

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SFHA Five-Year and Annual Plan

1.0 SFHA Information

PHA Code: **CA001**

PHA Type: **Standard**

PHA Fiscal Year Beginning: **Oct. 1, 2015**

2.0 Inventory (based on ACC units at time of FY beginning in 1.0 above)

Number of PH units: **6,103**

Number of HCV units: **9,396**

3.0 Submission Type

Five Year Plan

4.0 PHA Consortia PHA Consortia (Check box if submitting a Joint Plan: **N/A**)

5.0 Five-Year Plan

5.1 Mission

The Mission of the San Francisco Housing Authority is to deliver safe and decent housing for low income households and integrate economic opportunity for residents.

5.2 GOALS AND OBJECTIVES

SFHA GOAL #1: Expand the Supply of Assisted Housing – Fiscal Year 2010 Goals and 2015 Updates

Objectives

- Apply for additional rental vouchers and special purpose rental vouchers as they become available
- Reduce public housing vacant units from 450 units to zero units
- Leverage private or other public funds to create additional housing opportunities
- Acquire or build units or developments
- Locate infill affordable and market rate housing, where density permits, at family and elderly/disabled public housing units
- Use Section 8 Project Based Voucher Program assistance in conjunction with revitalization of public housing sites.

5-Year Update:

The SFHA has been successful in expanding the supply of assisted housing through various means.

The Public Housing Operations program has reduced its vacant unit count by over 100 units, was approved for all applications submitted under the Rental Assistance Demonstration Program (RAD), and successfully completed phase I of the Hunter's View Development. The Hunter's View development provided one-for-one replacement of Public Housing units in addition to providing affordable housing units, some of which are subsidized through the Housing Choice Voucher Program.

The Housing Choice Voucher (HCV) Program has successfully acquired over 100 VASH vouchers, has increased its payment standard, and was successful in its application to convert over 3,000 Public Housing Units to the Project Based Voucher program under the RAD program.

SFHA GOAL #2: Improve the Quality of Assisted Housing
Objectives

- Improve public housing management scores
- Improve voucher management (SEMAP scores) through the reorganization of the Section 8 Department
- Install a CRM (Customer Relationship Manager) application in order to monitor customer's satisfaction and relationship in order to improve services rendered
- Implement paperless solution addressing workflow processes, that will address green initiatives, paperless office and process streamline
- Install an agency wide document imaging, storage and retrieval system that will facilitate easy access to client records and will expedite client services
- Renovate or modernize public housing units
- Demolish or dispose of obsolete public housing
- Provide replacement public housing through the City of San Francisco's HOPE SF Initiative
- Provide replacement voucher(s)
- Partner with housing developers, non-profit , supportive service organizations and City agencies to rebuild public housing sites and provide services to residents

5 Year Update: The SFHA has been successful in moving forward with Goal #2.

The Public Housing Operations Program implemented a "first in first out" methodology for all work orders submitted in Public Housing developments. The workflow is paperless. Implemented in 2013, the SFHA has successfully closed over 42,000 work orders within the last 12 months. Additionally, the SFHA has continued to close over 3,000 work orders per month within 30 calendar days. The SFHA is expecting improved Public Housing Management Scores this next year.

The SFHA continues on track to provide replacement public housing through the HOPE SF initiative. Hunter's View Phase II is well under way with Alice Griffith Phase I commencing in 2015. The SFHA continues to partner with housing developers, the non-profit community and supportive service organizations in order to rebuild public housing sites and provide services to residents. For example, when the ROSS grant expired, the SFHA, working with the City and County of San Francisco's Department of Aging and Adult Services, was able to secure funding for all ROSS service coordinators to continue their services to solely serve Public Housing Residents.

The SFHA has partnered with various domestic violence groups and the Department on the Status of Women to request funding from the City and County of San Francisco to hire two Domestic Violence Liaisons to assist public housing residents with needed services. The City allocated funding for this purpose, which was awarded to La Casa de Las Madres. The SFHA has provided office space for both liaisons who are working closely with residents and have provided training to staff.

The Domestic Violence Liaison positions are focused on building capacity to safely identify and respond to the needs of abuse survivors through its 40+ sites and 20,000 residents. Through targeted outreach and education, training and technical assistance, survivor support services, and policy and systems advocacy, the project seeks to build access, knowledge, and capacity among SFHA residents, staff, and partners, empowering domestic violence survivors and communities which foster safe, domestic, violence-free, and thriving lives.

Additionally, the SFHA, working with the Department of Public Health, has opened a health and wellness center on-site at the largest family development, with the most need of assistance. Lastly, the SFHA will be converting over 3,000 units to project based voucher units under the RAD program and required that new management provide supportive services to ensure that residents receive the services that are desperately needed.

The Housing Choice Voucher Program (HCV), under new management, is expected to improve its SEMAP scores in the next 12 months. The HCV program has had a consistent

increase in PIC reporting and has reported a 100% submission score over the previous two (2) months. The HCV program is in the process of scanning all of its tenant files in order to facilitate easy access to client records and expedited client services.

The SFHA procured a new software program, "Emphasys Elite" that went "live" on June 1, 2015. The software system will be the operating system for both the Public Housing Operations Program and the Housing Choice Voucher Program. Additionally, the SFHA "went live" with a new Customer Relations Manager system and in July 2015 to improve customer relations and has consistently used share point to scan and store documents electronically.

SFHA GOAL #3: Increase Assisted Housing Choices

Objectives

- Continue to provide voucher mobility counseling
- Conduct outreach efforts to potential voucher landlord
- Maximize voucher payment standards
- Implement voucher homeownership program through the Family Self-Sufficiency Program
- Implement homeownership programs for public housing residents
- Implement public housing site-based waiting lists for HOPE VI family developments
- Utilize Voucher Homeownership in conjunction with comprehensive revitalization, infill housing, partnership with community-based organizations, City agencies, Family Self-Sufficiency (FSS) and other homeownership programs
- Use Section 8 Project-Based Voucher Program assistance in conjunction with public housing revitalization efforts to increase the supply of housing units
- Utilize to the fullest extent possible the Section 8 Project Based Voucher Program

5-year Update:

Under new management, the HCV program has successfully increased its voucher payment standards. Additionally, through the Annual Plan Process, the SFHA has set the framework for

implementation of site-based waiting lists for all developments under HOPE VI and those developments converting under RAD.

SFHA GOAL #4: Provide an Improved Living Environment

Objectives

- Where necessary, install security cameras in and around public housing sites
- Partner with the San Francisco Department in implementing community policing strategies at public housing sites
- Employ public housing residents to monitor activities around public housing sites
- De-concentrate poverty at lower density developments by replacing the public housing and adding housing for households with a range of incomes, adding other ancillary non-residential uses and creating mixed income, mixed use communities
- Develop better one-on-one relationships with communities surrounding family and senior housing sites
- Attend and coordinate neighborhood safety meetings

5-year update:

The SFHA has improved the living environment in its highest crime properties. In 2011 the SFHA received HUD's safety and security grant in the amount of \$250,000. With this funding, high tech security cameras were installed in the Alice Griffith and Sunnydale developments. Since their installation, it is estimated that crime in the Alice Griffith development decreased by upwards of 36%. The SFHA then installed cameras in the Potrero Terrace/Annex development in 2014. Most recently, the SFHA's Board of Commissioners approved a resolution allowing for the installation of cameras at Robert B. Pitts, Westside Courts, and Ping Yuen. The SFHA was not selected in the last two applications for the Safety and Security Grant through HUD but did submit an application.

In addition to the high tech cameras, the SFHA conducted an audit of all if its existing camera's between 2013 and 2014. Any cameras that were not functioning, were fixed. The SFHA established a Lease Enforcement division to focus its efforts on rent collection and safety. In

2014 quarterly meetings were established with the San Francisco Police Department. Additionally, the SFHA continues meeting monthly with community partners from various agencies in San Francisco to address concerns as they arise.

SFHA GOAL # 5: Promote Self-Sufficiency & Asset Development of Assisted Households

Objectives

- Increase resident training and access to technology and internet. Provide support in the deployment and execution of The City of San Francisco's free wireless access initiative. Extend technical support and consulting services to all San Francisco Housing Authority residential properties
- Increase the number and percentage of employed persons in assisted families.
- Provide or attract supportive services to improve recipients' employability.
- Provide or attract supportive services to increase independence for the elderly or families with disabilities
- Identify and implement programs with community-based partners that can promote family self-sufficiency, including first time homeownership opportunities for low-income families
- Apply for as many Super NOFA grants as applicable, including the ROSS grant funds
- Utilize Section 3 goals and the SFHA 25% resident hire policy to provide more employment opportunities for public housing residents

5-year update:

The SFHA has continued to apply for NOFA grants but has not been selected for further ROSS grant funding. As a result, the SFHA has worked with various organizations and agencies to ensure that residents continue receiving the same services consistently in the senior/disabled buildings. As mentioned above, when the ROSS grant expired, the City and County of San Francisco's (City) Department of Aging and Adult Services (DAAS) stepped in to continue to fund the service providers.

Additionally, the SFHA-with the Department of Public Health, has provided an annual training to property managers informing them of the various services available to residents by the City. In 2014 the SFHA along with the San Francisco Department on the Status of Women requested that the City fund two positions to assist with service connection for Victims of Domestic Violence. The funding was received and in January of 2015, the SFHA had two liaisons working out of its administrative offices assisting victims of domestic violence.

The SFHA's new Chief Procurement Officer is committed to ensuring contractors meet the resident hour requirements. For example, the SFHA conducted extensive outreach to hire residents as maintenance mechanics including sending the entire application packet to over 4000 resident households. More recently, an update on resident hours for the Hunters View Phase I redevelopment reflected that the actual hours worked by residents exceeded the resident hour requirement. Lastly, the SFHA scheduled numerous "tabling" sessions for "Year Up" to visit family sites in an effort to recruit youth between 18 and 24 years old for their program. As of January of 2015, of the 19 applicants, 16 were still in the program. The SFHA continues to be committed to resident hiring through internal hiring, external hiring and providing residents the connections needed to work.

SFHA GOAL #6: Ensure Equal Opportunity and Affirmatively Further Fair Housing
Objectives

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status and disability
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required
- Respond to residents and applicants relating to possible discrimination-based incidents and the implementation of procedures for addressing allegations of incidents with a perceived or actual discriminatory dimension
- Investigate allegations of discrimination based on sexual orientation
- Implement the Limited English Proficiency Plan that will guide SFHA in providing language services to clients whose native language is not English

5-year update:

The SFHA has implemented the Limited English Proficiency Plan. The implementation was complimented with training to all staff by the Department of Housing and Urban Developments

Fair Housing Office. The SFHA continues to work with residents who request assistance with reasonable accommodation requests and/or any related request. The SFHA takes any allegation of discrimination very seriously and investigates the allegations.

SFHA GOAL #7: Expand Customer Care Services and Practices
Objectives

- Deploy an Internet Kiosk, which will provide easy access to data pertinent to clients on Section 8, Public Housing and other services provided by the SFHA
- Provide customer service training for SFHA employees

5 year update:

The SFHA created a Client Placement Department in 2014, which oversees customer service, eligibility and client placement. The SFHA has converted to the “Emphasys Elite” software program. The Emphasys software was recently used for the opening of the waitlist of the Public Housing Operations program. Kiosks were placed in the lobby of the SFHA’s administrative building and continue to be available. The waiting list opening, with the assistance of the kiosks and Emphasys, was successful in attracting over 8,000 applicants in the course of seven (7) calendar days. This is one example of the progress being made by the SFHA to convert, section by section, to a paperless-more customer friendly- SFHA.

SFHA Goal #8: Develop and Implement Increased Greening and Environmental Practices throughout Agency and Properties

- Partner with the City of San Francisco’s Department of Public Works in beautifying public housing green spaces
- Implement maintenance and property management Energy Conservation Measures
- Negotiate better rates with utility and water providers
- Provide resident training on energy conservation and Energy Star products

- Provide an administrative directive on energy conservation for all SFHA administrative, management and maintenance staff
- Encourage energy efficiency in the design and construction of HOPE VI and public housing sites being redeveloped
- Install recycling centers at various public housing family developments

5 year update:

The Public Housing Operations department has developed and implemented numerous plans to improve its environmental practices. First, SFHA executed a \$30 million Energy Services Agreement with Ameresco in late 2010, completed by December 31, 2012, as planned. This twenty year term project encompassed 38 developments housing over 12,000 residents, and is expected to save up to \$70 million in utility costs over the twenty year contract term. Energy conservation measures included lighting and water efficiency upgrades, space heat and domestic hot water equipment upgrades, cogeneration, and basic weatherization measures. Additionally, Ameresco's EPC work with the SFHA allowed the SFHA to leverage \$11.7 million in ARRA grant funds, which were also contracted with Ameresco, to cover the cost of piping infrastructure improvements and new windows. Second, the SFHA installed a resident run recycling center at its biggest Public Housing development. The recycling center has been such a success that another recycling center will be opening shortly at a second development site. The SFHA has also cut its expenses significantly by encouraging residents to recycle.

6.0 SFHA Plan Update

SFHA Plan Update:

Detailed lists of changes to policies may be found in the Admissions and Continued Occupancy Policy (ACOP), attachment I, and the Housing Choice Voucher Administrative Plan (Admin Plan), attachment II.

These changes include:

- Mandatory policy changes
- Local discretionary policy changes
- Typographical error corrections
- Revisions for reading clarity

(a) Identify all SFHA Plan elements that have been revised by the SFHA since its last Annual Plan submission:

The following SFHA Plan elements marked 'R' have been revised since the last Annual Plan submission by the SFHA:

N/R denotes NO REVISION and N/A denotes NOT APPLICABLE

- R 903.7(1) Eligibility, Selection and Admissions Policies, including
Deconcentration and Wait List Procedures
- R 903.7(2) Financial Resources
- NR 903.7(3) Rent Determination
- R 903.7(4) Operation and Management
- R 903.7(5) Grievance Procedures
- NR 903.7(6) Designated Housing for Elderly and Disabled Families
- NR 903.7(7) Community Service and Self-Sufficiency
- R 903.7(8) Safety and Crime Prevention
- R 903.7(9) Pets

- NR 903.7(10) Civil Rights Certification
- R 903.7(11) Fiscal Year Audit
- NR 903.7(12) Asset Management
- R 903.7(13) Violence Against Women Act (VAWA)

- (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual SFHA Plan. For a complete list of SFHA Plan elements, see Section 6.0 of the instructions.

The Annual Plan is available to the public at:

Location Type	Address
Central Administrative office	1815 Egbert Avenue, San Francisco, California 94124
Housing Authority of the City and County of San Francisco website	www.sfha.org

6.0 SFHA Plan Elements

- 903.7(1) Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures

Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

Eligibility, Selection and Admissions Policies including de-concentration and Wait List Procedures are included for the Housing Choice Voucher (HCV) program in the HCV program Administrative Plan and for the Public Housing program in the Admissions and Continued Occupancy Policy (ACOP). All of the SFHA's policies and procedures adhere to the Code of Federal Regulations and all state and local applicable laws. These documents include policies and procedures governing resident or tenant eligibility, selection and admission that include applicable preferences for both programs. Additionally, the ACOP describes unit assigned policies for public housing. Proposed Changes to the ACOP may be viewed in Attachment 1.

Both the HCV Program Administrative Plan and the ACOP include the procedures for maintaining wait lists for admission. Proposed changes to the HCV Administrative Plan may be viewed in Attachment 2.

Rent Determination:

All rent determination policies and procedures are found in the HCV Administrative Plan and the ACOP for their respective programs. The SFHA has no ceiling rents and there are no plans to adopt any discretionary deductions or exclusions. The minimum rent for the Public Housing program is \$25.00 The HCV program increased its minimum rent from 0 to \$25. As required by the regulations, financial hardship provisions are made available to residents and participants of both programs who qualify.

A. Public Housing

Public Housing policies that govern resident or tenant eligibility, selection and admission (including preferences), unit assignment, procedures to maintaining waiting list for admission to public housing and site-based waiting lists (if applicable).

(1) Eligibility

The SFHA verifies eligibility for admission to public housing when it is expected that a family will be selected from the waiting list within 60 calendar days of the date of application.

The SFHA requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies
- State law enforcement agencies
- National Crime Information Center (NCIC)

(2) Selection and Assignment

Selection for admission to public housing shall be made from the SFHA's current waiting list in accordance with date and time of application and applicable preference(s) as follows.

(3) Preferences

The SFHA plans to employ the following admission preferences for admission to public housing:

- **Veteran /Surviving Spouse of Veteran (1 Point)**
- **Homeless in Permanent Supportive Housing and Shelters HSA/DPH Referral Preference (7 points)**
- **Involuntary Displacement from residence in San Francisco (5 points)**
- **Homeless in San Francisco (5 points)**
- **Resident in San Francisco Paying more than 70% of household income in rent (1 point)**

Absolute Preference(s)

Veteran/Surviving Spouse of Veteran

California Health and Safety Code section 34322.2(b) states that “[p]riority shall be given with each preference category to families of veterans and servicemen.” A veteran is someone who is recognized by a local, state or federal government agency as a veteran, and he or she receives or qualifies for veteran’s benefits. Therefore, veterans and families of veterans shall receive preference within each of SFHA’s preference categories.

Preferences

The following preferences are mutually exclusive. An applicant family is limited to selecting one of the following:

Homeless in San Francisco Permanent Supportive Housing and Shelters HSA/DPH Referral Preference (7 points)

Preference for families referred to by the City and County of San Francisco Human Services Agency (HSA) and Department of Public Health (DPH) that are transitioning from San Francisco Permanent Supportive Housing units or San Francisco Shelters. (*These families are still considered homeless for reporting purposes to HUD. This “move up” preference will contribute significantly to the community’s overall efforts to end homelessness by freeing up other units for currently homeless families and individuals with disabilities who need housing combined with services.*)

Involuntary Displacement (5 points)

An applicant is or will be involuntarily displaced if the applicant has vacated or will have to vacate his or her housing unit as a result of one or more of the following actions:

- *Natural Disaster:* A disaster such as a fire, flood or earthquake that resulted in the inhabitability of the applicant’s unit.
- *Domestic Violence, Dating Violence, Sexual Assault, and Stalking:* An applicant who has vacated due to actual or threatened physical violence directed against the applicant or one or more members of the applicant’s family by a spouse or other household member, who lives in housing with an individual who engages in such violence.
- *Victim of Hate Crime/Violent Crime:* Actual or threatened physical violence or intimidation directed against an applicant and his/her property that is based on the person’s race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, that is documented by law enforcement agency stating that the applicant is in an immediate life-threatening situation and that an immediate transfer would minimize the problem.
- *Government Action:* an action of a government agency related to code enforcement or public improvement or development.
Landlord Action: an action by a housing owner that results in an applicant’s having to vacate his or her unit, where the reason for the owner’s action was beyond the applicant’s ability to control or prevent, and despite the applicant having met all previously imposed conditions of occupancy, and the action is other than a rent increase.

Homeless in San Francisco (5 points)

An applicant family qualifies for this preference when the family:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
 - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
 - An institution that provides a residence for an individual; or
 - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
 - Not accessible to a family member with a disability.
- Families with minor children in a Single Room Occupancy (SRO) unit.
- Seniors and/or Disabled Individuals living in SRO's

Paying More than 70% of Income for Housing (1 point)

An applicant shall qualify for this local preference if the family is paying more than 70 percent of the total family income for rent. However, an applicant may not qualify for a preference under this section if the applicant is paying more than 70 percent of family income to rent a unit because his or her housing assistance under the public housing, Housing Choice Voucher program, or any program under the Housing and Urban Development Act of 1965 with respect to that unit has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures with respect to the occupancy of under-occupied and overcrowded units.

Prohibition of Preference if Applicant was evicted for drug-related and/or criminal activity

The SFHA will not give any preference to an applicant if any member of the family is a person who was evicted within the three years prior to applying because of drug-related criminal activity from any assisted housing program. The SFHA may consider granting a preference in any of the following cases:

- If the SFHA determines that the evicted person has successfully completed a rehabilitation program approved by the SFHA; or
- If the SFHA determines that the evicted person clearly did not participate in or knew about the drug related criminal activity; or
- If the SFHA determines that the evicted person no longer participates in any drug-related criminal activity

PUBLIC HOUSING ADMISSIONS PREFERENCES

CATEGORY	WAITLIST POINTS
Homeless Veteran in Permanent Supportive Housing	8
Homeless in San Francisco Permanent Supportive Housing and Shelters HSA/DPH Referral Preference	7
Involuntarily Displaced Veteran	6
Homeless Veteran in San Francisco	6
Involuntarily Displaced non-Veteran	5
Homeless non-Veteran in San Francisco	5
Veteran paying more than 70% of income for rent	2
Non-Veteran paying more than 70% of income for rent	1
Veteran with no local preference	1
Non-Veteran with no local preference	0

Note: Applicants with same point value will be pulled according to date and time.

Public Housing Resident Transfer List Preferences	(Order of Moves)
Reasonable Accommodations	Exhaust list
Emergency Transfers	First 5
Waiting List in Order of Preference	Next 5

(4) Unit Assignment

Applicants are given two (2) vacant unit choices before they are removed from the waiting list. Exceptions may be granted for refusal due to good cause as defined in 5-II.D in the ACOP.

(5) Maintaining Waiting List

The SFHA maintains a community-wide waiting list. Interested persons may apply for admission through the applicant portal at www.sfha.org.

(6) Occupancy

Applicants and residents may use the following reference materials to obtain information about the rules of occupancy of public housing.

- The SFHA-resident lease
- The SFHA's Admissions and Continued Occupancy Policy
- www.sfha.org

Residents must notify the SFHA of changes in family composition:

- Within 15 calendar days of change

(7) Deconcentration and Income Mixing

Admission & De-concentration Policy

- Annually, the SFHA will analyze the incomes of families residing in each of the developments, the income levels of the census tracts in which the developments are located and the income levels of families on the waiting list.
- Based on this analysis, the SFHA will determine the level of marketing strategies and which de-concentration incentives to implement.
- The SFHA will affirmatively market its housing to all eligible income groups.
- Applicants will not be steered to a particular site based solely on the family's Income.
- The de-concentration policy, and any incentives adopted in the future, will be applied in a consistent and non-discriminatory manner.

B. Housing Choice Voucher Program/Section 8

HCV/Section 8 policies that govern participant eligibility and selection for assistance (including preferences), and procedure for maintaining waiting list.

(1) Eligibility

The SFHA conducts screening to the extent of:

- Criminal or Drug-related activity only to the extent required by law, regulation, and/or policy.
- Domestic Violence – Attempt to ascertain whether domestic violence was a factor in the poor rental and tenancy history or criminal activity and exercise discretion in determining suitability for tenancy about the circumstances that may have contributed to the negative reporting.

The SFHA requests criminal records from the following enforcement agencies for screening purposes:

- Local law enforcement agencies
- State law enforcement agencies
- National Crime Information Center (NCIC)

The SFHA shares the following information with prospective landlords:

- Current name and address information.

(2) Waiting List Organization

The SFHA's waiting list for the HCV tenant-based assistance is not merged with any other program waiting list.

Interested persons may apply for admission to the HCV tenant-based Assistance program in the applicant portal, which can be accessed at www.sfha.org

(3) Search Time

The SFHA does give extensions on the initial 60-day period to search for a unit.

The SFHA may grant one or more extensions upon written request from the family, but the initial term plus any SFHA- approved extension may never exceed 180 calendar days from the initial date of issuance. Written requests for extensions must be received by the SFHA prior to the expiration date of the voucher.

Extension requests of the initial voucher term (60 calendar days) received prior to the expiration date will receive an automatic 60 calendar day extension. Extension requests received to further extend the voucher term (beyond 120 calendar days) will require a detailed statement of the family's efforts to locate

a unit. The SFHA may extend the voucher term for an additional 60-calendar days (or up to 180-calendar days).

The SFHA may approve additional extensions beyond the 180- day limit, only in the following circumstances:

- It is necessary as a reasonable accommodation for a person with disabilities.
- It is necessary due to reasons beyond the family's control, as determined by the SFHA. Following is a list of extenuating circumstances that the SFHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:
 - Serious illness or death in the family
 - Whether the family has already submitted requests for tenancy approval that were not approved by the SFHA
 - Whether family size or other special circumstances make it difficult to find a suitable unit

Any request for an additional extension must include the reason(s) an additional extension is necessary. The SFHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.

(4) Preferences

Veteran/Surviving Spouse of Veteran (+1 point)

California Health and Safety Code section 34322.2(b) states that “[p]riority shall be given with each preference category to families of veterans and servicemen.” A veteran is someone who is recognized by a local, state or federal government agency as a veteran, and he or she receives or qualifies for veteran’s benefits. Therefore, veterans and families of veterans shall receive one (1) additional preference within each of SFHA’s preference categories.

Families with a Right-of-Return

Families temporarily relocated by the SFHA due to RAD or HOPE SF will have a right-to-return to their property and have the highest priority and preference over any family on the site-based waiting list.

Terminated Due to Insufficient Funding

The SFHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The SFHA will verify this preference using the SFHA’s termination records.

Placement of Families that Require Relocation as Part of RAD Construction

The SFHA will offer a preference to any family that must be relocated due to construction of any RAD property. The family must be living in a RAD Placement Project and their unit must be scheduled for rehabilitation and/or construction.

San Francisco District Attorney Referrals (Witness Relocation Preference)

Notwithstanding all preferences indicated below, participants in the Witness Relocation and Protection (WRAP) Program will have Preference on the wait list and be considered for a Housing Choice Voucher or Project-Based Voucher Unit.

The SFHA in cooperation with the San Francisco District Attorney's Office (—DA) and the San Francisco Police Department (—SFPD) has established a preference on its Housing Choice Voucher Wait List to assist witnesses of violent crimes who are being assisted by the Witness Relocation and Assistance Program (—WRAP) in exchange for testimony leading to the conviction of the violent criminal(s) arrested in connection with the witnessed crime.

The Preference will enable a family on the Housing Choice Voucher or Project-based site-based wait list who participates in WRAP to rise to the top of the waitlist and be eligible for assistance. Strict guidelines must be met to ensure continued assistance for WRAP participants. In order for WRAP families to be eligible for assistance, the following conditions must be met:

1. The witness MUST testify in all trials held for the alleged crime. Eligibility for the WRAP must be initiated by the SFDA's Office who must present credible evidence, of the danger or of retaliatory violence to the family, to the SFHA;
2. All family members MUST NOT violate any conditions or responsibilities of the WRAP;
3. All household members MUST agree to move out of the City and County of San Francisco;
4. The Relocating family must be in good standing with the SFHA and not owe any balance for rent or unpaid tenant damages;
5. All family members MUST NOT return to the City and County of San Francisco while assisted under the Voucher Program as a participant of the WRAP unless required by the SFDA's office or the SFPD;
6. The family MUST cooperate with all requirements of the Section 8 Program and the —receiving housing authority's policies and procedures; and
7. If the family reveals the location of its new unit or their status in the California WRAP, the Voucher, at the discretion of the initial or the receiving Public Housing Agency (—PHA) may be forfeited. Circumstances will be reviewed on a case by case basis.

If the household is absorbed by the receiving SFHA, the voucher will be released for use by another family on the Housing Choice Voucher wait list. The SFHA will administer any Voucher that is not absorbed by the receiving SFHA to the extent funding permits.

Public Housing Residents Who Have Been Approved for an Emergency Transfer

The SFHA will provide a maximum of ten (10) vouchers per fiscal year for Public Housing Residents who have been approved for an emergency transfer. The resident family must be on the Housing Choice Voucher Waitlist to qualify for this preference. The family must show that there is good cause reason to deny any or all Public Housing units that have been offered prior to qualifying for the Housing Choice Voucher. Good cause for refusal of a unit offer under this preference includes demonstration by the family that accepting previously offered unit(s) would place a family or family member's life, health or safety in immediate jeopardy. Reasons must be specific to the family. Compelling documentation such as court orders or restraining orders will be requested. Refusals due to the location of the unit alone are not considered "good cause." The final decision as to whether the family receives a voucher under this preference will be made by the Executive Director or his/her designee.

Involuntarily Displaced with Residential Certificate of Preference (COP)

[PBV Sited Based ONLY]

Certificate of Preference is a document issued by the former San Francisco Redevelopment Agency ("Agency") to displaced residents and businesses in the 1960s, when the Agency was implementing its federally-funded urban renewal program. MOHCD now administers this program. This Certificate gives such households preferential consideration for MOHCD-funded housing projects and former San Francisco Redevelopment Agency funded housing projects. Certificates of Preference were issued to households that were displaced by Redevelopment Agency activity in the 1960's and early 1970's, specifically in the Western Addition and in Hunters Point.

Involuntarily Displaced with an Ellis Act Housing Preference (EAHP) Certificate

[PBV Sited Based ONLY]

The Ellis Act Displacement Emergency Assistance Ordinance was passed into law on December 18th, 2013. The legislation required a new preference in all City Affordable Housing Programs for tenants who are displaced due to withdrawal of their housing unit from the rental market, as allowable under the State Ellis Act. The legislation responded to concern over a rise in these Ellis Act Evictions that paralleled rising market-rate housing prices in 2013. The Mayor's Office of Housing and Community Development's Ellis Act Housing Preference (EAHP) Program implements the Ellis Act Displacement Emergency Assistance Ordinance.

Homeless in San Francisco Permanent Supportive Housing and Shelters HSA/DPH Referral Preference (7 points)

Preference for families referred to by the City and County of San Francisco Human Services Agency (HSA) and Department of Public Health (DPH) that are transitioning from San Francisco Permanent Supportive Housing units or San Francisco Shelters. (*These families are still considered homeless for reporting purposes to HUD. This “move up” preference will contribute significantly to the community’s overall efforts to end homelessness by freeing up other units for currently homeless families and individuals with disabilities who need housing combined with services.*)

Involuntary Displacement

An applicant is or will be involuntarily displaced if the applicant has vacated or will have to vacate his or her housing unit as a result of one or more of the following actions:

- *Natural Disaster:* A disaster such as a fire, flood or earthquake that resulted in the inhabitation of the applicant’s unit.
- *Domestic Violence, Dating Violence, Sexual Assault, and Stalking:* An applicant who has vacated due to actual or threatened physical violence directed against the applicant or one or more members of the applicant’s family by a spouse or other household member, who lives in housing with an individual who engages in such violence.
- *Victim of Hate Crime/Violent Crime:* Actual or threatened physical violence or intimidation directed against an applicant and his/her property that is based on the person’s race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, that is documented by law enforcement agency stating that the applicant is in an immediate life-threatening situation and that an immediate transfer would minimize the problem.
- *Government Action:* an action of a government agency related to code enforcement or public improvement or development. *Landlord Action:* an action by a housing owner that results in an applicant’s having to vacate his or her unit, where the reason for the owner’s action was beyond the applicant’s ability to control or prevent, and despite the applicant having met all previously imposed conditions of occupancy, and the action is other than a rent increase.

Homeless in San Francisco

An applicant family qualifies for this preference when the family:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
 - A supervised publicly or privately operated shelter or transitional housing

- residence designed to provide temporary living accommodations; or
- An institution that provides a residence for an individual; or
- A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- Not accessible to a family member with a disability.
- Families with minor children in a Single Room Occupancy (SRO) unit.
- Senior or disabled person in a Single Room Occupancy (SRO) unit.

Substandard Non-Homeless in San Francisco

An applicant who is a "Non-Homeless: A non-homeless applicant is living in substandard housing if their present unit meets any of the following criteria: it is "dilapidated;" it does not have operable indoor plumbing; it does not have a usable flush toilet and a usable bathtub or shower inside the unit for the exclusive use of the family; it does not have electricity, or has inadequate or unsafe electrical service; it does not have a safe or adequate source of heat; it should, but does not have a kitchen, or it has been declared unfit for habitation by a government agency. A housing unit is "dilapidated" if it does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family or it has one or more critical defects or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may have resulted from the original construction or from continued neglect or lack of repair, or from serious damage to the structure. For purposes of this section, Single Room Occupancy (SRO) units are not automatically considered substandard due to the lack of a kitchen and/or bathroom. SROs do not generally have these features and are thus considered standard housing unless in dilapidated physical condition.

Paying More than 70% of Income for Housing

An applicant shall qualify for this local preference if the family is paying more than 70 percent of the total family income for rent. However, an applicant may not qualify for a preference under this section if the applicant is paying more than 70 percent of family income to rent a unit because his or her housing assistance under the public housing, Housing Choice Voucher program, or any program under the Housing and Urban Development Act of 1965 with respect to that unit has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures with respect to the occupancy of under-occupied and overcrowded units.

Prohibition of Preference if Applicant was evicted for drug-related and/or criminal activity
The SFHA will not give any preference to an applicant if any member of the family is a person who was evicted within the three years prior to applying because of drug-related criminal

activity from any assisted housing program. The SFHA may consider granting a preference in any of the following cases:

- If the SFHA determines that the evicted person has successfully completed a rehabilitation program approved by the SFHA; or
- If the SFHA determines that the evicted person clearly did not participate in or knew about the drug related criminal activity; or
- If the SFHA determines that the evicted person no longer participates in any drug-related criminal activity

Elderly Residents of Alice Griffith for Dr. Davis Senior Homes and Senior Center

This preference is specific for the Project-Based Voucher Assistance at the Dr. Davis Senior Homes and Senior Center at 1751 Carroll Ave. To qualify for this preference, a family must be elderly family member of an existing family at Alice Griffith. The family must be at least 60 years of age to apply for the waiting list but must be at least 62 at the time of admission.

Homeless Families Referred by the Department of Public Health

This preference is specific and limited to the Project Based Voucher Assistance at the Dr. Davis Senior Homes and Senior Center. To qualify for this preference, the family must be referred by the Department of Public Health as an elderly and homeless family

Homeless Veterans Referred by the Department of Veterans Affairs

This preference is specific to voucher available or units available at properties assisted by HUD-VASH funding. To qualify for this preference, the family must be referred as homeless by the Department of Veterans Affairs

Families Referred by the San Francisco Human Services Agency - FUP

This preference is specific to vouchers available based on funding received by HUD for the Family Unification Program (FUP). To qualify for this preference, the family must be referred as a qualified family by the San Francisco Human Services Agency.

Families Referred by the San Francisco Human Services Agency - Medical

This preference is specific to vouchers available based on funding received by HUD targeted to families who meet specified medical criteria. To qualify for this preference, the family must be referred by a designated partner agency and determined eligible for referral by the San Francisco Human Services Agency.

2015 Preference Change: Added the following

1. Human Services and Department of Public Health Shelter Referrals to the definition of "Homeless in Permanent Supportive Housing" in both the ACOP and Admin Plan.
2. Placement of Families that Require Relocation as Part of RAD Construction" in the HCV Admin Plan
3. Elderly Residents of Alice Griffith for Dr. Davis Senior Homes and Senior Center

903.7(2) Financial Resources

Sources		
1. Federal Grants (FY 2015 grants)	Planned \$	Planned Uses
a) Public Housing Operating Fund		
b) 2015 Public Housing Capital Fund Program	\$9,573,562.00	Public housing capital improvements
2015 CFP-RHF	\$224,345.00	Vacant Unit Rehabilitation
2015 CFP-RHF	\$146,821.00	Vacant Unit Rehabilitation
c) Annual Contributions for Section 8 Tenant-Based Assistance		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
2014 CFP	\$172,784.00	Public housing capital improvements
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
Mod Rehab		HCV Tenant Based Assistance

HOPWA		HCV Tenant Based Assistance
5. Non-federal sources (list below)		
Total resources	\$10,117,512	

903.7 (3) Rent Determination Policies

A. Public Housing

(1) Income Based Rent Policies

a. Use of discretionary policies

The SFHA will employ discretionary rent-setting policies for income based rent in public housing.

b. Minimum Rent

The SFHA's minimum rent is \$25.00.

SFHA Policy

The financial hardship rules described below apply in this jurisdiction because the SFHA has established a minimum rent of \$25.00.

Overview

The SFHA has established that minimum rent in both the Public Housing and Housing Choice Voucher Program is \$25. The SFHA allows for exemptions from the minimum rent if the family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the SFHA determines that a hardship exists, the TTP is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

SFHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

SFHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent and/or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.
- (4) A death has occurred in the family.

SFHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

- (5) The family has experienced other circumstances determined by the SFHA.

SFHA Policy

The SFHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the SFHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The SFHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

SFHA Policy

The SFHA defines temporary hardship as a hardship expected to last 90 calendar days or less. Long term hardship is defined as a hardship expected to last more than 90 calendar days.

The SFHA may not evict the family for nonpayment of minimum rent during the 90-day period beginning the month following the family's request for a hardship exemption.

When the minimum rent is suspended, the TTP reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
Assume the PHA has established a minimum rent of \$35.	
TTP – No Hardship	TTP – With Hardship
\$0 30% of monthly adjusted income	\$0 30% of monthly adjusted income
\$15 10% of monthly gross income	\$15 10% of monthly gross income
N/A Welfare rent	N/A Welfare rent
\$25 Minimum rent	\$25 Minimum rent
Minimum rent applies. TTP = \$25	Hardship exemption granted. TTP = \$15

SFHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent. The SFHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the SFHA determines there is no financial hardship, the SFHA will reinstate the minimum rent and require the family to repay the amounts suspended.

For procedures pertaining to grievance hearing requests based upon the SFHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

SFHA Policy

The SFHA will require the family to repay the suspended amount within 30 calendar days of the SFHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the SFHA determines that a qualifying financial hardship is temporary, the SFHA must reinstate the minimum rent from the beginning of the first of the month following the date of the family's request for a hardship exemption.

The family must resume payment of the minimum rent and must repay the SFHA the amounts suspended. HUD requires the SFHA to offer a reasonable repayment agreement, on terms and conditions established by the SFHA. The SFHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

For procedures pertaining to grievance hearing requests based upon the SFHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

SFHA Policy

The SFHA will enter into a repayment agreement in accordance with the SFHA's repayment agreement policy (see Chapter 16).

Long-Term Hardship

If the SFHA determines that the financial hardship is long-term, the SFHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

SFHA Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

Flat Rents

The SFHA uses the following sources of information in setting the market-based flat rents to establish comparability:

- The section 8 rent reasonableness study of comparable housing
- Fair Market Rents

B. Section 8 Tenant-based Assistance

(1) Payment Standards

The payment standard sets the maximum subsidy payment a family can receive from the SFHA each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of rents in the market area.

The SFHA must establish a payment standard schedule that establishes payment standard amounts for each FMR area within the SFHA's jurisdiction, and for each unit size within each of the FMR areas. For each unit size, the SFHA may establish a single payment standard amount for the whole FMR area, or may set different payment standards for different parts of the FMR area. Unless HUD grants an exception, the SFHA is required to establish a payment standard within a "basic range" established by HUD – between 90 and 110 percent of the published FMR for each unit size.

Updating Payment Standards

When HUD updates its FMRs, the SFHA must update its payment standards if the standards are no longer within the basic range [24 CFR 982.503(b)]. HUD may require the SFHA to make further adjustments if it determines that rent burdens for assisted families in the SFHA's jurisdiction are unacceptably high 24 CFR 982.503(g)].

SFHA Policy

The SFHA will review the appropriateness of the payment standards on an annual basis when the new FMR is published. In addition to ensuring the payment standards are always within the "basic range" the SFHA will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

Funding Availability: The SFHA will review the budget to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. The SFHA will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.

Rent Burden of Participating Families: Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, the SFHA will consider increasing the payment standard. In evaluating rent burdens, the SFHA will not include families renting a larger unit than their family unit size.

Quality of Units Selected: The SFHA will review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.

Changes in Rent to Owner: The SFHA may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases/decreases by bedroom size.

Unit Availability: The SFHA will review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.

Lease-up Time and Success Rate: The SFHA will consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.

Changes to payment standard amounts will be effective on December 1st of every year unless, based on the proposed FMRs, it appears that one or more of the SFHA's current payment standard amounts will be outside the basic range when the final FMRs are published. In that case, the SFHAs payment standards will be effective October 1st instead of December 1st.

If the SFHA has already processed reexaminations that will be effective on or after October 1st, and the effective date of the payment standards is October 1st, the SFHA will make retroactive adjustments to any such reexaminations if the new payment standard amount is higher than the one used by the SFHA at the time the reexamination was originally processed.

Exception Payment Standards [982.503(c)]

The SFHA must request HUD approval to establish payment standards that are higher than the basic range. At HUD's sole discretion, HUD may approve a payment standard amount that is higher than the basic range for a designated part of the FMR area. HUD may approve an exception payment standard amount (in accordance with program requirements) for all units, or for all units of a given size, leased by program families in the exception area. Any SFHA with jurisdiction in the exception area may use the HUD-approved exception payment standard amount. The total population of all HUD-approved exception areas in an FMR area may not include more than 50 percent of the population of the FMR area.

Unit-by-Unit Exceptions [24 CFR 982.503(c)(2)(ii)]

Unit-by-unit exceptions to the SFHA's payment standards generally are not permitted. However, an exception may be made as a reasonable accommodation for a family that includes a person with disabilities. (See Chapter 2 of the ACOP or Administrative Plan for a discussion of reasonable accommodations.) This type of exception does not affect the SFHA's payment standard schedule.

When needed as a reasonable accommodation, the SFHA may make an exception to the payment standard without HUD approval if the exception amount does not exceed 110 percent

of the applicable FMR for the unit size [HCV GB 7-9]. The SFHA may request HUD approval for an exception to the payment standard for a particular family if the required amount falls between 110 and 120 percent of the FMR.

SFHA Policy

A family that requires a reasonable accommodation may request a higher payment standard at the time the Request for Tenancy Approval (RFTA) is submitted. The family must document the need for the exception. In order to approve an exception, or request an exception from HUD, the SFHA must determine that:

There is a shortage of affordable units that would be appropriate for the family;

The family's TTP would otherwise exceed 40 percent of adjusted monthly income; and

The rent for the unit is reasonable.

"Success Rate" Payment Standard Amounts [24 CFR 982.503(e)]

If a substantial percentage of families have difficulty finding a suitable unit, the SFHA may request a "success rate payment standard" that applies to the entire jurisdiction. If approved by HUD, a success rate payment standard allows the SFHA to set its payment standards at 90-110 percent of a higher FMR (the 50th, rather than the 40th percentile FMR). To support the request, the SFHA must demonstrate that during the most recent 6-month period for which information is available:

- Fewer than 75 percent of families who were issued vouchers became participants;
- The SFHA had established payment standards for all unit sizes, and for the entire jurisdiction, at 110 percent of the published FMR; and
- The SFHA had a policy of allowing voucher holders who made sustained efforts to locate units at least 60 calendar days to search for a unit.

Although HUD approves the success rate payment standard for all unit sizes in the FMR area, the SFHA may choose to adjust the payment standard for only some unit sizes in all, or a designated part, of the SFHA's jurisdiction within the FMR area.

Decreases in the Payment Standard Below the Basic Range [24 CFR 982.503(d)]

The SFHA must request HUD approval to establish a payment standard amount that is lower than the basic range. At HUD's sole discretion, HUD may approve establishment of a payment standard lower than the basic range. HUD will not approve a lower payment standard if the family share for more than 40 percent of program participants exceeds 30 percent of adjusted monthly income

(2) Minimum Rent

SFHA HCV minimum rent is \$25.00.

903.7(4) Operation and Management

(1) SFHA Management Structure

- a. A brief description of the management structure and organization of the SFHA

The Executive Director directs the day-to day management and operation of the SFHA with the assistance of the following senior staff and their line staff.

- Client Placement
- Budget and Strategic Planning
- Procurement
- Finance
- Modernization
- Information Technology
- Human Resources
- Government Affairs and Policy
- Public Housing Operations
- Housing Choice Voucher

Public Housing

- Public Housing Director
- Area Manager
- Property Manager
- Eligibility Worker

Section 8

- Leased Housing Director
- Program Manager
- Eligibility Worker

b. Management and Maintenance Policies

The SFHA has adopted the following policies that contain the Agency's rules, standards, and policies that govern management, operation, and maintenance of the Public Housing and HCV assistance programs.

Public Housing Management:

- Admissions and Continued Occupancy Policy (ACOP)
- Procurement Policy
- Personnel Policy
- Maintenance Policy

Section 8 Management:

- Administrative Plan
- Procurement Policy
- Personnel Policy

903.7-1 Grievance Procedures

A. Public Housing Grievances

The Admissions and Continued Occupancy Policy provides the policy and procedure for how Grievances and appeals are administered. Chapter 14 is also provided below:

Chapter 14

GRIEVANCES AND APPEALS

INTRODUCTION

This chapter discusses grievances and appeals pertaining to SFHA actions or failures to act that adversely affect public housing applicants or residents. The policies are discussed in the following three parts:

Part I: Informal Reviews for Public Housing Applicants. This part outlines the requirements and procedures for informal hearings for public housing applicants.

Part II: Informal Hearings with Regard to Noncitizens. This part discusses informal hearings regarding citizenship status and where they differ from the requirements for general applicant and tenant grievances.

Part III: Grievance Procedures/Hearings for Public Housing Residents. This part outlines the requirements and procedures for handling grievances for public housing residents.

PART I: INFORMAL REVIEWS FOR PUBLIC HOUSING APPLICANTS

14-I.A. OVERVIEW

When the SFHA makes a decision that has a negative impact on an applicant family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal review. HUD regulations do not provide a structure for or requirements regarding informal review for applicants (except with regard to citizenship status, to be covered in Part II). This part discusses the SFHA policies necessary to respond to applicant appeals through the informal hearing process.

14-I.B. INFORMAL REVIEW PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]

Informal reviews are provided for public housing applicants. An applicant is someone who has applied for admission to the conventional public housing program, but is not yet a tenant in the program. Informal reviews are intended to provide a means for an applicant to dispute a determination of ineligibility for admission to a project [24 CFR 960.208(a)]. Applicants to public housing are not entitled to the same hearing process afforded tenants under the SFHA grievance procedure [24 CFR 966.53(a) and PH Occ GB, p. 58].

Informal reviews provide applicants the opportunity to review the reasons for denial of admission and to present evidence to refute the grounds for denial.

Use of Informal Review Process

The SFHA must offer the opportunity of an informal review to applicants who have been determined as ineligible for admission.

SFHA Policy

The SFHA will only offer informal reviews to applicants for the purpose of disputing denials of admission.

The request for review must be presented, in writing, within 15 calendar days after the SFHA makes the decision to deny applicant admission. The applicant must include the address where the applicant would like the Notice of the Review to be delivered. Otherwise, the Notice of Review will be delivered to the last known address in the SFHA's database.

The informal review will be conducted within 15 calendar days following receipt of the request.

Notice of Denial [24 CFR 960.208(a)]

The SFHA must give an applicant prompt notice of a decision denying eligibility for admission. The notice must contain a brief statement of the reasons for the SFHA decision, and must also state that the applicant may request an informal review to dispute the decision. The notice must describe how to obtain the informal review.

Prior to notification of denial based on information obtained from criminal or sex offender registration records, the family, in some cases, must be given the opportunity to dispute the

information in those records which would be the basis of the denial. See Section 3-III.G for details concerning this requirement.

Scheduling a Review

SFHA Policy

A request for an informal review must be made in writing and delivered to the SFHA either in person or by first class mail, by the close of the business day, no later than 15 calendar days from the date of the SFHA's notification of denial of admission.

Except as provided in Section 3-III.F, the SFHA will schedule and send written notice of the informal review within 15 calendar days of the family's request.

Conducting an Informal Review [PH Occ GB, p. 58]

SFHA Policy

The informal review will be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant will be provided an opportunity to present written or oral objections to the decision of the SFHA.

The person conducting the informal review will make a recommendation regarding the applicant's eligibility for admission. The SFHA is responsible for making the final decision as to whether admission should be granted or denied.

If the applicant fails to appear for their informal review, the applicant will have one opportunity to reschedule within 15 calendar days of the original hearing date. If the applicant misses the re-scheduled hearing, the denial of admission will stand and the family will be so notified.

Informal Review Decision [PH Occ GB, p. 58]

SFHA Policy

The SFHA will notify the applicant of the SFHA's final determination, including a brief statement of the reasons for the final decision.

In rendering a decision, the SFHA will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the notice

The validity of grounds for denial of admission. If the grounds for denial are not specified in the regulations or in SFHA policy, then the decision to deny assistance will be overturned. See Chapter 3 for a detailed discussion of the grounds for applicant denial.

The validity of the evidence. The SFHA will evaluate whether the facts presented prove the grounds for denial of admission. If the facts prove that there are grounds for denial, and the denial is required by HUD, the SFHA will uphold the decision to deny admission.

If the facts prove the grounds for denial, and the denial is discretionary, the SFHA will consider the recommendation of the person conducting the informal review in making the final decision whether to deny admission.

The SFHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed by U.S postal mail within 15 calendar days of the informal review, to the applicant and his or her representative, if any.

If the decision of the informal review overturns the denial, processing for admission will resume.

Reasonable Accommodation for Persons with Disabilities [24 CFR 966.7]

Persons with disabilities may request reasonable accommodations to participate in the informal hearing process and the SFHA must consider such accommodations. The SFHA must also consider reasonable accommodation requests pertaining to the reasons for denial if related to the person's disability. See Chapter 2 for more detail pertaining to reasonable accommodation requests.

PART II: INFORMAL HEARINGS WITH REGARD TO NONCITIZENS

14-II.A. HEARING AND APPEAL PROVISIONS FOR NONCITIZENS [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. These special hearings are referred to in the regulations as informal hearings, but the requirements for such hearings are different from the informal hearings used to deny applicants for reasons other than immigration status.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while the SFHA hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or the SFHA informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

As discussed in Chapters 3 and 13, the notice of denial or termination of assistance for noncitizens must advise the family of any of the following that apply:

- That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- The family may be eligible for proration of assistance.
- In the case of a tenant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- That the family has a right to request an informal hearing with the SFHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

United States Citizenship and Immigration Services Appeal Process [24 CFR 5.514(e)]

When the SFHA receives notification that the USCIS secondary verification failed to confirm eligible immigration status, the SFHA must notify the family of the results of the USCIS verification. The family will have 30 calendar days from the date of the notification to request an appeal of the USCIS results. The request for appeal must be made by the family in writing directly to the USCIS. The family must provide the SFHA with a copy of the written request for appeal and proof of mailing.

SFHA Policy

The SFHA will notify the family in writing of the results of the USCIS secondary verification within 15 calendar days of receiving the results.

The family must provide the SFHA with a copy of the written request for appeal and proof of mailing within 15 calendar days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to the SFHA, of its decision. When the USCIS notifies the SFHA of the decision, the SFHA must notify the family of its right to request an informal hearing.

SFHA Policy

The SFHA will send written notice to the family of its right to request an informal hearing within 15 calendar days of receiving notice of the USCIS decision regarding the family's immigration status.

Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, an applicant family may request that the SFHA provide a hearing. The request for a hearing must be made either within 30 calendar days of receipt of the SFHA notice of denial, or within 30 calendar days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

Informal Hearing Officer

The SFHA must provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision.

Evidence

The family must be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of the SFHA pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

SFHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of SFHA documents no later than 12:00 p.m. on the business day prior to the hearing.

The family must be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family must also be provided the opportunity to refute evidence relied upon by the SFHA, and to confront and cross-examine all witnesses on whose testimony or information the SFHA relies.

Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to arrange for an interpreter to attend the hearing, at the expense of the family, or the SFHA, as may be agreed upon by the two parties. If the family does not arrange for their own interpreter, the SFHA is still obligated to provide oral translation services in accordance with its LEP Plan.

Recording of the Hearing

The family is entitled to have the hearing recorded by a digital recorder upon request. A copy of the hearing is available on cd for \$5.00.

SFHA Policy

The SFHA will not provide a transcript of an audio taped informal hearing.

Hearing Decision

The SFHA must provide the family with a written notice of the final decision, based solely on the facts presented at the hearing, within 15 calendar days of the date of the informal hearing. The notice must state the basis for the decision.

Retention of Documents [24 CFR 5.514(h)]

The SFHA must retain, for a minimum of four (4) years, the following documents that may have been submitted to the SFHA by the family, or provided to the SFHA as part of the USCIS appeal or the SFHA informal hearing process:

- The application for assistance
- The form completed by the family for income reexamination
- Photocopies of any original documents, including original USCIS documents
- The signed verification consent form
- The USCIS verification results
- The request for a USCIS appeal
- The final USCIS determination
- The request for an informal hearing
- The final informal hearing decision

Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, a resident family may request that the SFHA provide a hearing. The request for a hearing must be made either within 30 calendar days of receipt of the SFHA notice of termination, or within 30 calendar days of receipt of the USCIS appeal decision.

The informal hearing procedures for resident families whose tenancy is being terminated based on immigration status is the same as for any grievance under the grievance procedures for resident families found in Part III below.

PART III: GRIEVANCE PROCEDURES/HEARINGS FOR PUBLIC HOUSING RESIDENTS

14-III.A. REQUIREMENTS [24 CFR 966.52]

SFHAs must have a grievance procedure in place through which residents of public housing are provided an opportunity to grieve any SFHA action or failure to act involving the lease or SFHA policies which adversely affect their rights, duties, welfare, or status.

The SFHA grievance procedure is included in the lease agreement.

SFHA Policy

The SFHA must provide at least 30 calendar days' notice to tenants and resident organizations setting forth proposed changes in the SFHA grievance procedure, and providing an opportunity to present written comments. Comments submitted by residents must be considered by the SFHA before adoption of any changes to the grievance procedure by the SFHA.

Residents and resident organizations will have 30 calendar days from the date they are notified by the SFHA of any proposed changes in the SFHA grievance procedure, to submit written comments to the SFHA.

14-III.B. DEFINITIONS [24 CFR 966.53; 24 CFR 966.51(a)(2)(i)]

There are several terms used by HUD with regard to public housing grievance procedures, which take on specific meanings different from their common usage. These terms are as follows:

- **Grievance** – any dispute which a tenant may have with respect to SFHA action or failure to act in accordance with the individual tenant's lease or SFHA regulations which adversely affect the individual tenant's rights, duties, welfare or status
- **Complainant** – any tenant whose grievance is presented to the SFHA or at the project management office
- **Due Process Determination** – a determination by HUD that law of the jurisdiction requires that the tenant must be given the opportunity for a hearing in court which provides the basic elements of due process before eviction from the dwelling unit
- **Elements of Due Process** – an eviction action or a termination of tenancy in a state or local court in which the following procedural safeguards are required:
 - Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
 - Right of the tenant to be represented by counsel
 - Opportunity for the tenant to refute the evidence presented by the SFHA including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the tenant may have
 - A decision on the merits

- **Hearing Officer/Panel** – a person/panel selected in accordance with HUD regulations to hear grievances and render a decision with respect thereto
- **Tenant** – the adult person (or persons) (other than a live-in aide)
 - Who resides in the unit, and who executed the lease with the SFHA as lessee of the dwelling unit, or, if no such person now resides in the unit Who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit

14-III.C. APPLICABILITY [24 CFR 966.51]

Grievances could potentially address most aspects of the SFHA's operation. However, there are some situations for which the grievance procedure is not applicable.

The grievance procedure is applicable only to individual tenant issues relating to the SF. It is not applicable to disputes between tenants not involving the SFHA. Class grievances are not subject to the grievance procedure and the grievance procedure is not to be used as a forum for initiating or negotiating policy changes of the SFHA.

HUD has issued a due process determination of the state of California. The SFHA may exclude from the SFHA grievance procedure any grievance concerning a termination of tenancy or eviction that involves:

- Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of the SFHA
- Any violent or drug-related criminal activity on or off such premises
- Any criminal activity that resulted in felony conviction of a household member

SFHA Policy

Since HUD has issued a due process determination of the state of California, the SFHA may evict through the state/local judicial eviction procedures. The SFHA is not required to provide the opportunity for a hearing under the SFHA's grievance procedure as described above.

See Chapter 13 for related policies on the content of termination notices.

14-III.D. INFORMAL HEARING OF GRIEVANCE [24 CFR 966.54]

A grievance shall be personally presented, either orally or in writing, to the SFHA office or to the office of the housing development in which the complainant resides so that the grievance may be discussed informally and settled without a hearing.

SFHA Policy

A request for an Informal Hearing must be presented, in writing, within 15 calendar days after the SFHA makes the decision that the resident wishes to grieve. The Informal Hearing will be scheduled within 15 calendar days following receipt of the request. Grievances relating to a notice to quit must be presented within the period set forth on such notice. The SFHA will make an initial attempt to determine which dates and times are available to the tenant, their representative and the SFHA staff. If no response is provided within 72 hours of the initial correspondence (phone call or e-mail) then a date will be selected by the SFHA and the notice of the date and time of the hearing will be sent to the tenant notifying them of the date and time of the hearing. Cancellation or request for rescheduling of this date by the tenant, advocate or SFHA staff will count as the parties one time reschedule per the language below.

Cancellation of the hearing must be made by the resident or the authorized representative in writing.

If a tenant fails to attend the scheduled meeting without prior notice, the SFHA will reschedule the appointment one time only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family.

HUD regulations require that a summary of such discussion will be prepared within a reasonable time and one copy will be given to the tenant and one retained in the SFHA's tenant file.

The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore, and will specify the procedures by which a hearing may be obtained if the complainant is not satisfied.

SFHA Policy

The SFHA will prepare a summary of the informal hearing within 15 calendar days; one copy to be given to the tenant and one copy to be retained in the SFHA's tenant file. If the tenant does not provide a preferred method to receive the decision, the decision will be mailed to the tenant via U.S. Postal mail to the address that the SFHA has on record.

14-III.E. PROCEDURES TO OBTAIN A FORMAL HEARING [24 CFR 966.55]

Requests for Hearing and Failure to Request [24 CFR 966.55(a), (c), and (d)]

All grievances must be presented in accordance with the informal procedures prescribed above as a condition prior to a Formal Hearing. However, if the complainant can show good cause for failure to proceed with the informal hearing process to the hearing officer/panel, the hearing officer/panel may waive this provision [24 CFR 966.55(d)].

The complainant must submit the request in writing for a Formal Hearing within a reasonable time after receipt of the summary of informal discussion [24 CFR 966.55(a)]. The request must specify the reasons for the grievance and the action or relief sought.

SFHA Policy

The resident must submit a written request for a Formal Hearing to the SFHA within 15 calendar days of the tenant's receipt of the summary of the informal hearing. Cancellation of the hearing must be made by the resident in writing. The scope of the Formal Hearing is limited to those matters originally requested in the Informal Hearing.

If the complainant does not request a hearing, the SFHA's disposition of the grievance under the informal hearing process will become final. However, failure to request a hearing does not constitute a waiver by the complainant of the right to contest the SFHA's action in disposing of the complaint in an appropriate judicial proceeding [24 CFR 966.55(c)].

Scheduling of Hearings [24 CFR 966.55(f)]

If the complainant has complied with all requirements for requesting a hearing as described above, a hearing must be scheduled by the hearing officer/panel promptly for a time and place reasonably convenient to both the complainant and the SFHA. A written notification specifying the time, place and the procedures governing the hearing must be delivered to the complainant and the appropriate SFHA official. Delivery to SFHA staff may be in the form of e-mail. Delivery to the tenant will be via U.S. Postal Mail unless the tenant or their representative states that e-mail is sufficient.

SFHA Policy

Within 15 calendar days of receiving a written request for a hearing, the SFHA will schedule and send the written notice of the hearing to the complainant.

The SFHA shall permit the tenant and/or representative to reschedule a hearing one time. If the reason for rescheduling is due to a time or date conflict, the tenant must inform the SFHA of a more suitable date and time frame for the rescheduled hearing. If the applicant misses the rescheduled hearing, the adverse action being grieved will stand and the family will be so notified.

The tenant may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. *Good cause* is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

Requests to reschedule a hearing must be made in writing at least 24 hours prior to the hearing date. At its discretion, the SFHA may request documentation of the "good cause" prior to rescheduling the hearing.

14-III.F. SELECTION OF HEARING OFFICER/PANEL [24 CFR 966.55(b)]

The grievance hearing must be conducted by an impartial person or persons appointed by the SFHA, other than the person who made or approved the SFHA action under review, or a subordinate of such person.

SFHA Policy

A grievance hearing shall be conducted by a single impartial hearing officer appointed by the SFHA, other than the person who made or approved the SFHA action under review or a subordinate of such person. A Hearing Officer will be designated by the Executive Director or his/her designee. Eligible SFHA Hearing Officers will include employees in management classifications.

Efforts will be made to assure that the person selected is not a friend, nor enemy, of the complainant and that they do not have a personal stake in the matter under dispute or will otherwise have an appearance of a lack of impartiality.

The SFHA shall consult the resident organizations before SFHA appointment of each hearing officer. Any comments or recommendations submitted by the tenant organizations shall be considered by the SFHA before appointment.

14-III.G. PROCEDURES GOVERNING THE HEARING [24 CFR 966.56]

Rights of Complainant [24 CFR 966.56(b)]

The complainant will be afforded a fair hearing. This includes:

- The opportunity to examine before the hearing any SFHA documents, including records and regulations that are directly relevant to the hearing. The tenant must be allowed to copy any such document at the tenant's expense. If the SFHA does not make the document available for examination upon request by the complainant, the SFHA may not rely on such document at the grievance hearing unless the document is considered attorney/client privilege.

SFHA Policy

The tenant will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of SFHA documents no later than 12:00 p.m. on the business day prior to the hearing.

- The right to be represented by counsel or other person chosen to represent the tenant and to have such person make statements on the tenant's behalf.

SFHA Policy

Hearings may be attended by the following applicable persons:

A SFHA representative(s) and any witnesses for the SFHA

The tenant and any witnesses for the tenant

The tenant's counsel or other representative

The SFHA's counsel

Any other person approved by the SFHA as a reasonable accommodation for a person with a disability

- The right to present evidence and arguments in support of the tenant's complaint, to controvert evidence relied on by the SFHA or project management, and to confront and cross-examine all witnesses upon whose testimony or information the SFHA or project management relies.
- A decision based solely and exclusively upon the facts presented at the hearing.

Decision without Hearing [24 CFR 966.56(c)]

The hearing officer/panel may render a decision without proceeding with the hearing if the hearing officer/panel determines that the issue has been previously decided in another proceeding.

Failure to Appear [24 CFR 966.56(d)]

If the complainant or the SFHA fails to appear at a scheduled hearing, the hearing officer/panel may make a determination to postpone the hearing for not to exceed 12 calendar days or may make a determination that the party has waived his/her right to a hearing. Both the complainant and the SFHA must be notified of the determination by the hearing officer/panel: Provided, that a determination that the complainant has waived his/her right to a hearing will not constitute a waiver of any right the complainant may have to contest the SFHA's disposition of the grievance in an appropriate judicial proceeding.

There may be times when a complainant does not appear due to unforeseen circumstances which are out of their control and are no fault of their own.

SFHA Policy

If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 15 minutes. If the tenant appears within 15 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 15 minutes of the scheduled time, they will be considered to have failed to appear.

If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the SFHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. If the reason for rescheduling is due to a time or date conflict, the complainant must inform the SFHA of a more suitable date and time frame for the hearing. If the applicant misses the rescheduled appointment, the adverse action being grieved will stand and the family will be so notified.

Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

General Procedures [24 CFR 966.56(e), (f), and (g)]

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the SFHA must sustain the burden of justifying the SFHA action or failure to act against which the complaint is directed [24 CFR 966.56(e)].

The hearing must be conducted informally by the hearing officer/panel. The SFHA and the tenant must be given the opportunity to present oral or documentary evidence pertinent to the facts and issues raised by the complaint and to question any witnesses. In general, all evidence is admissible and may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings [24 CFR 966.56(f)].

SFHA Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses. All witnesses shall be asked to swear or affirm that the information they are about to provide is true.

Documentary evidence: a writing which is relevant to the case, for example, a letter written to the SFHA. Writings include all forms of recorded communication or representation, including letters, emails, words, pictures, sounds, videotapes or symbols or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.

If the SFHA fails to comply with the discovery requirements (providing the tenant with the opportunity to examine SFHA documents prior to the grievance hearing), the hearing officer will refuse to admit such evidence.

Other than the failure of the SFHA to comply with discovery requirements, the hearing officer has the authority to overrule any objections to evidence.

The hearing officer/panel must require the SFHA, the complainant, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer/panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate [24 CFR 966.56(f)].

The complainant or the SFHA may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript [24 CFR 966.56(g)].

Accommodations of Persons with Disabilities [24 CFR 966.56(h)]

The SFHA must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

If the tenant is visually impaired, any notice to the tenant which is required in the grievance process must be in an accessible format.

See Chapter 2 for a thorough discussion of the SFHA's responsibilities pertaining to reasonable accommodation.

14-III.H. DECISION OF THE HEARING OFFICER [24 CFR 966.57]

The hearing officer must issue a written decision, stating the reasons for the decision, within a reasonable time after the hearing. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the decision must be sent to the tenant and the SFHA. The SFHA must retain a copy of the decision in the tenant's folder. A copy of the decision, with all names and identifying references deleted, must also be maintained on file by the SFHA and made available for inspection by a prospective complainant, his/her representative, or the hearing officer. [24 CFR 966.57(a)].

SFHA Policy

In rendering a decision, the hearing officer will consider the following matters:

SFHA Notice to the Family: The hearing officer will determine if the reasons for the SFHA's decision are factually stated in the notice.

Discovery: The hearing officer will determine if the family was given the opportunity to examine any relevant documents in accordance with SFHA policy.

SFHA Evidence to Support the SFHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the SFHA's conclusion.

Validity of Grounds for Termination of Tenancy (when applicable): The hearing officer will determine if the termination of tenancy is for one of the grounds specified in the HUD regulations and SFHA policies. If the grounds for termination are not specified in the regulations or in compliance with SFHA policies, then the decision of the SFHA will be overturned.

The hearing officer will issue a written decision to the family and the SFHA no later than 15 calendar days after the hearing. The report will contain the following information:

Hearing information:

- Name of the complainant
- Date, time and place of the hearing
- Name of the hearing officer
- Name of the SFHA representative(s)
- Name of family representative (if any)
- Names of witnesses (if any)

Background: A brief, impartial statement of the reason for the hearing and the date(s) on which the informal hearing was held, who held it, and a summary of the results of the informal hearing. Also includes the date the complainant requested the grievance hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the SFHA's decision.

Order: The hearing report will include a statement of whether the SFHA's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the SFHA to change the decision. The following are the general policies in overturning decisions:

In the case of termination of tenancy, the hearing officer will instruct the SFHA to restore the family's status.

In the case of overturning income, rent or third party reconciliations, the hearing officer will instruct the SFHA to re-calculate the rent and/or income based on the documents originally submitted to the SFHA at the time the calculations were completed. Income or expense documents submitted at the hearing but not available to the SFHA at the time of calculation may not be used to overturn a previous calculation but will rather serve the basis for a future interim calculation.

In the case of a denial reasonable accommodation request, the hearing officer may overturn a decision and require the SFHA to re-consider the request or enter into negotiations with the family. The hearing officer is not authorized to make reasonable accommodation decisions on behalf of the SFHA.

The SFHA shall retain a copy of the decision in the tenant's folder (24 CFR. section 966.57(a)).

Recording of the Hearing

The SFHA will record every hearing with a digital recorder or similar device. The family may record the hearing with their own device or request a copy from the SFHA for a charge of \$5.00. video recordings of the hearing are not permitted absent consent of all parties in the hearing room at the commencement of the hearing. If additional persons shall enter, they too must

agree to a video recording of the hearing. Absent unanimous consent of video recording throughout the hearing by all parties present, a video recording of the hearing shall not be permitted.

Procedures for Further Hearing

SFHA Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the hearing officer will make a decision based on the evidence presented up to the deadline.

Final Decision [24 CFR 966.57(b)]

The decision of the hearing officer shall be binding on the SFHA which shall take all actions, or refrain from any actions, necessary to carry out the decision unless the SFHA Board of Commissioners determines within a reasonable time, and promptly notifies the complainant of its determination, that:

- The grievance does not concern SFHA action or failure to act in accordance with or involving the complainant's lease or SFHA regulations, which adversely affect the complainant's rights, duties, welfare or status;
- The decision of the hearing officer is contrary to applicable Federal, State, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the SFHA;

SFHA Policy

When the SFHA considers the decision of the hearing officer invalid due to the reasons stated above, it will present the matter to the SFHA Board of Commissioners within 15 calendar days of the date of the hearing officer's decision. The Board has 30 calendar days to consider the decision. If the Board decides to reverse the hearing officer's decision, it must notify the complainant within 15 calendar days of the decision.

- A decision by the hearing officer or Board of Commissioners in favor of the SFHA or which denies the relief requested by the complainant in whole or in part shall not constitute a waiver of, nor affect in any matter whatever, any rights the complainant may have to a trial de novo or judicial review in any judicial proceedings, which may thereafter be brought in the matter.

B. Section 8 Tenant-Based Assistance Grievances

When the SFHA makes a decision that has a negative impact on a family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal review; for participants, or for applicants denied admission because of citizenship issues, the appeal takes the form of an informal hearing.

PHAs are required to include in their administrative plans, informal review procedures for applicants, and informal hearing procedures for participants [24 CFR 982.54(d)(12) and (13)].

PART III: INFORMAL REVIEWS AND HEARINGS

16-III.A. OVERVIEW

Both applicants and participants have the right to disagree with, and appeal, certain decisions of the SFHA that may adversely affect them. SFHA decisions that may be appealed by applicants and participants are discussed in this section.

The process for applicant appeals of SFHA decisions is called the “informal review.” For participants (or applicants denied admission because of citizenship issues), the appeal process is called an “informal hearing.” The SFHA is required to include informal review procedures for applicants and informal hearing procedures for participants in their administrative plans [24 CFR 982.54(d)(12) and (13)].

16-III.B. INFORMAL REVIEWS

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program, but is not yet a participant in the program. Informal reviews are intended to provide a “minimum hearing requirement” [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements. (Federal Register Volume 60, No. 127, p 36490).

Decisions Subject to Informal Review

The SFHA must give an applicant the opportunity for an informal review of a decision denying assistance [24 CFR 982.554(a)]. Denial of assistance may include any or all of the following [24 CFR 982.552(a)(2)]:

- Denying listing on the SFHA waiting list
- Denying or withdrawing a voucher
- Refusing to enter into a HAP contract or approve a lease
- Refusing to process or provide assistance under portability procedures
- Denial of assistance based on an unfavorable history that may be the result of domestic violence, dating violence, sexual assault or stalking. (See Section 3-III.G.)

Informal reviews are *not* required for the following reasons [24 CFR 982.554(c)]:

- Discretionary administrative determinations by the SFHA

- General policy issues or class grievances
- A determination of the family unit size under the SFHA subsidy standards
- A SFHA determination not to approve an extension or suspension of a voucher term
- A SFHA determination not to grant approval of the tenancy
- A SFHA determination that the unit is not in compliance with the HQS
- A SFHA determination that the unit is not in accordance with the HQS due to family size or composition

SFHA Policy

The SFHA will only offer an informal review to applicants for whom assistance is being denied. Denial of assistance includes: denying listing on the SFHA waiting list; denying or withdrawing a voucher; refusing to enter into a HAP contract or approve a lease; refusing to process or provide assistance under portability procedures.

Notice to the Applicant [24 CFR 982.554(a)]

The SFHA must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reasons for the SFHA decision, and must also state that the applicant may request an informal review of the decision. The notice must describe how to obtain the informal review.

Scheduling an Informal Review

SFSFHA Policy

A request for an informal review must be made in writing and delivered to the SFHA either in person or by first class mail, by the close of the business day, no later than 15 calendar days from the date of the SFHA's denial of assistance.

Except as provided in Section 3-III.G, the SFHA must schedule and send written notice of the informal review within 15 calendar days of the family's request.

Informal Review Procedures [24 CFR 982.554(b)]

SFSFHA Policy

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of the SFHA.

The person conducting the review will make a recommendation to the SFHA, but the SFHA is responsible for making the final decision as to whether assistance should be granted or denied.

If the applicant fails to appear for their informal hearing, the applicant will have one opportunity to reschedule within 15 calendar days of the original hearing date. If the applicant misses the re-scheduled hearing, the denial of admission will stand and the family will be so notified.

Informal Review Decision [24 CFR 982.554(b)]

The SFHA will notify the applicant of the SFHA's final determination, including a brief statement of the reasons for the final decision.

SFHA Policy

In rendering a decision, the SFHA will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the notice to the family.

The validity of the grounds for denial of assistance. If the grounds for denial are not specified in the regulations, or in SFHA policy, then the decision to deny assistance will be overturned. See Chapter 3 for a detailed discussion of the grounds for applicant denial.

The validity of the evidence. The SFHA will evaluate whether the facts presented prove the grounds for denial of assistance. If the facts prove that there are grounds for denial, and the denial is required by HUD, the SFHA will uphold the decision to deny assistance.

If the facts prove the grounds for denial, and the denial is discretionary, the SFHA will consider the recommendation of the person conducting the informal review in making the final decision whether to deny assistance.

The SFHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 15 calendar days of the informal review, to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission will resume.

16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555,

Pub.L. 109-162]

The SFHA must offer an informal hearing for certain determinations relating to the individual circumstances of a participant family. A participant is defined as a family that has been admitted to the SFHA's HCV program and is currently assisted in the program. The purpose of the informal hearing is to consider whether the SFHA's decisions related to the family's circumstances are in accordance with the law, HUD regulations and SFHA policies.

The SFHA is not permitted to terminate a family's assistance until the time allowed for the family to request an informal hearing has elapsed, and any requested hearing has been completed. Termination of assistance for a participant may include any or all of the following:

- Refusing to enter into a HAP contract or approve a lease
- Terminating housing assistance payment(s) under an outstanding HAP contract
- Refusing to process or provide assistance under portability procedures

Decisions Subject to Informal Hearing

Circumstances for which the SFHA must give a participant family an opportunity for an informal hearing are as follows:

- A determination of the family's annual or adjusted income, and the use of such income to compute

the housing assistance payment

- A determination of the appropriate utility allowance (if any) for tenant-paid utilities from the SF utility allowance schedule
- A determination of the family unit size under the SFHA's subsidy standards
- A determination that a certificate program family is residing in a unit with a larger number of bedrooms than appropriate for the family unit size under the SFHA's subsidy standards, or the SFHA determination to deny the family's request for exception from the standards
- A determination to terminate assistance for a participant family because of the family's actions or failure to act
- A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted under SFSFHA Policy and HUD rules
- A determination to terminate a family's Family Self Sufficiency contract, withhold supportive services, or propose forfeiture of the family's escrow account [24 CFR 984.303(i)]
- A determination to deny admission based on an unfavorable history that may be the result of domestic violence, dating violence, sexual assault, or stalking.

Circumstances for which an informal hearing is not required are as follows:

- Discretionary administrative determinations by the SFHA
- General policy issues or class grievances
- Establishment of the SFHA schedule of utility allowances for families in the program
- SFHA determination not to approve an extension or suspension of a voucher term
- SFHA determination not to approve a unit or tenancy
- SFHA determination that a unit selected by the applicant is not in compliance with the HQS
- SFHA determination that the unit is not in accordance with HQS because of family size
- A determination by the SFHA to exercise or not to exercise any right or remedy against an owner under a HAP contract

SFHA Policy

The SFHA will only offer participants the opportunity for an informal hearing when required.

Informal Hearing Procedures

Notice to the Family [24 CFR 982.555(c)]

When the SFHA makes a decision that is subject to informal hearing procedures, the SFHA must inform the family of its right to an informal hearing at the same time that it informs the family of the decision.

For decisions related to the family's annual or adjusted income, the determination of the appropriate utility allowance, and the determination of the family unit size, the SFHA must notify the family that they may ask for an explanation of the basis of the determination, and that if they do not agree with the decision, they may request an informal hearing on the decision.

For decisions related to the termination of the family's assistance, or the denial of a family's request for an exception to the SFHA's subsidy standards, the notice must contain a brief statement of the reasons for the decision, a statement that if the family does not agree with the decision, the family may request an informal hearing on the decision, and a statement of the deadline for the family to request an informal hearing.

SFHA Policy

In cases where the SFHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following:

- The proposed action or decision of the SFHA.
- A brief statement of the reasons for the decision, including the regulatory reference.
- A statement of the family's right to an explanation of the basis for the SFHA's decision.
- A statement that if the family does not agree with the decision the family may request an informal hearing of the decision.
- A deadline for the family to request the informal hearing.
- To whom the hearing request should be addressed.

Scheduling an Informal Hearing [24 CFR 982.555(d)]

When an informal hearing is required, the SFHA must proceed with the hearing in a reasonably expeditious manner upon the request of the family.

SFSFHA Policy

A request for an informal hearing must be made in writing and delivered to the SFHA either in person or by first class mail, by the close of the business day, no later than 15 calendar days from the date of the SFHA's decision or notice to terminate assistance.

The SFHA must schedule and send written notice of the informal hearing to the family within 15 calendar days of receipt of the family's request. The SFHA will make an initial attempt to determine which dates and times are available to the tenant, their representative and the SFHA staff. If no response is provided within 72 hours of the initial correspondence (phone call or e-mail) then a date will be selected by the SFHA and the notice of the date and time of the hearing will be sent to the tenant notifying them of the date and time of the hearing. Cancellation or request for rescheduling of this date by the tenant, advocate or SFHA staff will count as the parties one time reschedule per the language below.

Cancellation of the hearing must be made by the resident or the authorized representative in writing.

The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. *Good cause* is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made 25 personally or in writing prior to the hearing date. At its discretion, the SFHA may request documentation of the "good cause" prior to rescheduling the hearing.

If the family does not appear at the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the SFHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The SFHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. At its discretion, the SFHA may request documentation of the “good cause” prior to rescheduling the hearing.

Pre-Hearing Right to Discovery [24 CFR 982.555(e)]

Participants and the SFHA are permitted pre-hearing discovery rights. The family must be given the opportunity to examine before the hearing any SFHA documents that are directly relevant to the hearing. The family must be allowed to copy any such documents at their own expense. If the SFHA does not make the document available for examination on request of the family, the SFHA may not rely on the document at the hearing.

The SFHA hearing procedures may provide that the SFHA must be given the opportunity to examine at the SFHA offices before the hearing, any family documents that are directly relevant to the hearing. The SFHA must be allowed to copy any such document at the SFHA’s expense. If the family does not make the document available for examination on request of the SFHA, the family may not rely on the document at the hearing.

For the purpose of informal hearings, *documents* include records and regulations.

SFHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of SFHA documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date

The SFHA must be given an opportunity to examine at the SFHA offices before the hearing any family documents that are directly relevant to the hearing. Whenever a participant requests an informal hearing, the SFHA will automatically mail a letter to the participant requesting a copy of all documents that the participant intends to present or utilize at the hearing. The participant must make the documents available no later than 12:00 pm on the business day prior to the scheduled hearing date.

Participant’s Right to Bring Counsel [24 CFR 982.555(e)(3)]

At its own expense, the family may be represented by a lawyer or other representative at the informal hearing.

Informal Hearing Officer [24 CFR 982.555(e)(4)]

Informal hearings will be conducted by a person approved by the SFHA, other than the person who made or approved the decision or a subordinate of the person who made or approved the decision.

SFHA Policy

SFHA hearings will be conducted by a single hearing officer and not a panel. A hearing shall be conducted by an impartial person or persons, appointed by the SFHA, other than the person who made or approved the SFHA action under review or a subordinate of such person.

Attendance at the Informal Hearing

SFHA Policy

Hearings may be attended by a hearing officer and the following applicable persons:

- A SFHA representative(s) and any witnesses for the SFHA
- The participant and any witnesses for the participant
- The participant's counsel or other representative
- Any other person approved by the SFHA as a reasonable accommodation for a person with a disability

Conduct at Hearings

The person who conducts the hearing may regulate the conduct of the hearing in accordance with the SFHA's hearing procedures [24 CFR 982.555(4)(ii)].

SFHA Policy

The hearing officer is responsible to manage the order of business and to ensure that hearings are conducted in a professional and businesslike manner. Attendees are expected to comply with all hearing procedures established by the hearing officer and guidelines for conduct. Any person demonstrating disruptive, abusive or otherwise inappropriate behavior will be excused from the hearing at the discretion of the hearing officer.

Evidence [24 CFR 982.555(e)(5)]

The SFHA and the family must be given the opportunity to present evidence and question any witnesses. In general, all evidence is admissible at an informal hearing. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

SFHA Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing and must be directly or indirectly related to the cause of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses. All witnesses shall be asked to swear or affirm that the information they are about to provide is true.

Documentary evidence: a writing which is relevant to the case, for example, a letter written to the SFHA. Writings include all forms of recorded communication or representation, including letters, words, pictures, sounds, videotapes or symbols or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as

the sole basis for the hearing officer's decision.

Evidence and testimony will be limited to the cause of the hearing.

If either the SFHA or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence.

Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.

Hearing Officer's Decision [24 CFR 982.555(e)(6)]

The person who conducts the hearing must issue a written decision, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the hearing must be furnished promptly to the family.

SFHA Policy

In rendering a decision, the hearing officer will consider the following matters:

SFHA Notice to the Family: The hearing officer will determine if the reasons for the SFHA's decision are factually stated in the Notice.

Discovery: The hearing officer will determine if the SFHA and the family were given the opportunity to examine any relevant documents in accordance with SFHA Policy.

SFHA Evidence to Support the SFHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the SFHA's conclusion.

Validity of Grounds for Termination of Assistance (when applicable): The hearing officer will determine if the termination of assistance is for one of the grounds specified in the HUD regulations and SFHA policies. If the grounds for termination are not specified in the regulations or in compliance with SFHA policies, then the decision of the SFHA will be overturned.

The hearing officer will issue a written decision to the family and the SFHA no later than 15 calendar days after the hearing; one copy to be given to the tenant and one copy to be retained in the SFHA's tenant file. If the tenant does not provide a preferred method to receive the decision, the decision will be mailed to the tenant via U.S. Postal mail to the address that the SFHA has on record.

The report will contain the following information:

Hearing information:

- Name of the participant;
- Date, time and place of the hearing;
- Name of the hearing officer;
- Name of the SFHA representative; and
- Name of family representative (if any).

Background: A brief, impartial statement of the reason for the hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the SFHA's decision.

Order: The hearing report will include a statement of whether the SFHA's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the SFHA to change the decision. The following are the general policies in overturning decisions:

In the case of termination of assistance, the hearing officer will instruct the SFHA to restore the participant's program status.

In the case of overturning income and rent computations, the hearing officer will instruct the SFHA to re-calculate the rent and/or income based on the documents originally submitted to the SFHA at the time the calculations were completed. Income or expense documents submitted at the hearing but not available to the SFHA at the time of calculation may not be used to overturn a previous calculation but will rather serve as the basis for a future interim calculation.

In the case of a denial of reasonable accommodation request, the hearing officer may overturn a decision and require the SFHA to re-consider the request or enter into negotiations with the family. The hearing officer is not authorized to make reasonable accommodation decisions on behalf of the SFHA.

Recording of the Hearing

The SFHA will record every hearing with a digital recorder or similar device. The family may record the hearing with their own device or request a copy from the SFHA for a charge of \$5.00. Video recordings of the hearing are not permitted absent consent of all parties in the hearing room at the commencement of the hearing. If additional persons shall enter, they too must agree to a video recording of the hearing. Absent unanimous consent of video recording throughout the hearing by all parties present, a video recording of the hearing shall not be permitted.

Procedures for Rehearing or Further Hearing

SFHA Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date before reaching a decision. If the family misses an

appointment or deadline ordered by the hearing officer, the action of the SFHA will take effect and another hearing will not be granted.

SFHA Notice of Final Decision [24 CFR 982.555(f)]

The decision of the hearing officer is binding on the SFHA which must take the action, or refrain from taking the action cited in the decision unless the Executive Director or his designee determines within a reasonable time, and notifies the complainant that:

- The grievance does not concern SFHA action or failure to act in accordance with or involving the complainant's lease or SFHA policies which adversely affect the complainant's rights, duties, welfare, or status; or
- The decision of the hearing officer/panel is contrary to federal, state, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the SFHA.

If the SFHA determines it is not bound by the hearing officer's decision in accordance with HUD regulations, the SFHA must promptly notify the family of the determination and the reason for the determination.

SFHA Policy

The SFHA will mail the hearing officer's report to the participant and their representative.

16-III.D. HEARING AND APPEAL PROVISIONS FOR NON-CITIZENS [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. Applicants who are denied assistance due to immigration status are entitled to an informal hearing, not an informal review.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while the SFHA hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or the SFHA informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

As discussed in Chapters 3 and 11, the notice of denial or termination of assistance for noncitizens must advise the family:

- That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- The family may be eligible for proration of assistance.
- In the case of a participant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- That the family has a right to request an informal hearing with the SFHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

USCIS Appeal Process [24 CFR 5.514(e)]

When the SFHA receives notification that the USCIS secondary verification failed to confirm eligible immigration status, the SFHA must notify the family of the results of the USCIS verification. The family will have 30 calendar days from the date of the notification to request an appeal of the USCIS results. The request for appeal must be made by the family in writing directly to the USCIS. The family must provide the SFHA with a copy of the written request for appeal and the proof of mailing.

SFHA Policy

The SFHA will notify the family in writing of the results of the USCIS secondary verification within 15 calendar days of receiving the results.

The family must provide the SFHA with a copy of the written request for appeal and proof of

mailing within 15 calendar days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to the SFHA, of its decision. When the USCIS notifies the SFHA of the decision, the SFHA must notify the family of its right to request an informal hearing.

SFHA Policy

The SFHA will send written notice to the family of its right to request an informal hearing within 15 calendar days of receiving notice of the USCIS decision regarding the family's immigration status.

Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the SFHA provide a hearing. The request for a hearing must be made either within 30 calendar days of receipt of the SFHA notice of denial, or within 30 calendar days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

Informal Hearing Officer

The SFHA must provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision. See Section 16-III.C. for a listing of positions that serve as informal hearing officers.

Evidence

The family must be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of the SFHA pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

SFHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of SFHA documents no later than 12:00 p.m. on the business day prior to the hearing.

The family must be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family must also be provided the opportunity to refute evidence relied upon by the SFHA, and to confront and cross-examine all witnesses on whose testimony or information the SFHA relies.

Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to arrange for an interpreter to attend the hearing, at the expense of the family, or the SFHA, as may be agreed upon by the two parties.

Recording of the Hearing

The SFHA will record every hearing with a digital recorder or similar device. The family may record the hearing with their own device or request a copy from the SFHA for a charge of \$5.00. Video recordings of the hearing are not permitted absent consent of all parties in the hearing room at the commencement of the hearing. If additional persons shall enter, they too must agree to a video recording of the hearing. Absent unanimous consent of video recording throughout the hearing by all parties present, a video recording of the hearing shall not be permitted.

Hearing Decision

The SFHA must provide the family with a written final decision, based solely on the facts presented at the hearing, within 15 calendar days of the date of the informal hearing. The decision must state the basis for the decision.

Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the SFHA provide a hearing. The request for a hearing must be made either within 30 calendar days of receipt of the SFHA notice of termination, or within 30 calendar days of receipt of the USCIS appeal decision.

For the informal hearing procedures that apply to participant families whose assistance is being terminated based on immigration status, see Section 16-III.C.

Retention of Documents [24 CFR 5.514(h)]

The SFHA must retain for a minimum of four (4) years the following documents that may have been submitted to the SFHA by the family, or provided to the SFHA as part of the USCIS appeal or the SFHA informal hearing process:

- The application for assistance
- The form completed by the family for income reexamination
- Photocopies of any original documents, including original USCIS documents
- The signed verification consent form
- The USCIS verification results
- The request for a USCIS appeal

- The final USCIS determination
- The request for an informal hearing
- The final informal hearing decision

903.7(i) Designated Housing for Elderly and Disabled Families

The SFHA has not designated or applied for approval to designate or does not plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will not apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year.

903.7(7) Community Service and Self-Sufficiency

The SFHA, through partnerships with community based agencies and government agencies, offers the following services to residents of public housing:

- a. Boys and Girls Club Clubhouses at Sunnydale and Hunters Point —"A" East
- b. Head Start centers at North Beach, Sunnydale, Westside Courts and Alemany
- c. Service Coordinators at Clementina Towers, 360 Ellis Street, 666 Ellis Street and Rosa Parks, Woodside Gardens, Mission Dolores, 363 Noe Street, 462 Duboce Street, 25 Sanchez Street, 491 31st Avenue, 430 Turk Street, 939 Eddy Street, and 951 Eddy Street
- d. Economic Opportunity Council Child Development Centers at Potrero Annex and Ping Yuen
- e. Food pantries at Sunnydale, Hunters Point —A West, Rosa Parks, 350 Ellis Street and 666 Ellis Street
- f. Summer lunch program at approximately 15 family developments
- g. Afterschool enrichment programs at Ping Yuen, Sunnydale, Westbrook Apartments,
- h. Computer lab at Westside Courts and Valencia Gardens

Residents may request to volunteer at any of the sites above.

The SFHA will continue to comply with Section 3 goals and objectives. Prospective contractors will identify public housing residents who can be referred to construction and non-construction jobs that the SFHA lets out to bid.

The SFHA's HCV Department will oversee the reorganization of its FSS program. The Public Housing Operations Program is exploring the viability of an FSS program.

Community Service requirements for public housing residents is monitored by individual property managers at the time of annual recertification. The 201 Annual Plan includes proposed language regarding the Community Service requirement.

(2) Family Self Sufficiency programs

The SFHA will continue to seek out funding opportunities to support efforts to move families to self-sufficiency.

D. Community Service Requirement

PART I

COMMUNITY SERVICE REQUIREMENT

11-I.A. OVERVIEW

HUD regulations pertaining to the community service requirement are contained in 24 CFR 960 Subpart F (960.600 through 960.609). PHAs and residents must comply with the community service requirement, effective with PHA fiscal years that commenced on or after October 1, 2000. Per 903.7(l)(1)(iii), the PHA Plan must contain a statement of how the SFHA will comply with the community service requirement, including any cooperative agreement that the SFHA has entered into or plans to enter into.

Community service is the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community service is not employment and may not include political activities [24 CFR 960.601(b)].

In administering community service requirements, the SFHA must comply with all nondiscrimination and equal opportunity requirements [24 CFR 960.605(c)(5)].

11-I.B. REQUIREMENTS

Each adult resident of the SFHA, who is not exempt, must [24 CFR 960.603(a)]:

- Contribute 8 hours per month of community service; or
- Participate in an economic self-sufficiency program (as defined in the regulations) for 8 hours per month; or
- Perform 8 hours per month of combined activities (community service and economic self-sufficiency programs).

SFHA Policy

An individual may not skip a month and then double up the following month, unless special circumstances warrant it. The SFHA will make the determination of whether to permit a deviation from the schedule.

Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month, must notify the SFHA in

writing within 7 calendar days of the circumstances becoming known. The SFHA will review the request and notify the individual, in writing, of its determination within 15 calendar days. The SFHA may require those individuals to provide documentation to support their claim.

Definitions

Exempt Individual [24 CFR 960.601(b), Notice PIH 2009-48]

An *exempt individual* is an adult who:

- Is age 62 years or older
- Is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions
- Is a primary caretaker of such an individual
- Is engaged in work activities

SFHA Policy

The SFHA will consider 30 hours per week as the minimum number of hours needed to qualify for a work activity exemption.

- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the SFHA is located, including a state-administered welfare-to-work program; or
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the SFHA is located, including a state-administered welfare-to-work program, and has not been found by the state or other administering entity to be in noncompliance with such program.

Community Service [24 CFR 960.601(b), Notice PIH 2009-48]

Community service is the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community service is not employment and may not include political activities.

Eligible community service activities include, but are not limited to, work at:

- Local public or nonprofit institutions such as schools, head start programs, before or after school programs, child care centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing)
- Nonprofit organizations serving SFHA residents or their children such as: Boy or Girl Scouts, Boys or Girls Club, 4-H clubs, Police Assistance League (PAL), organized children's recreation, mentoring or education programs, Big Brothers or Big Sisters, garden centers, community clean-up programs,

beautification programs

- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels
- Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods, or performing arts
- SFHA housing to improve grounds or provide gardens (so long as such work does not alter the SFHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board
- Care for the children of other residents so parent may volunteer

PHAs may form their own policy in regards to accepting community services at profit-motivated entities, acceptance of volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work.

SFHA Policy

The SFHA will accept community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work as eligible community service activities.

Economic Self-Sufficiency Program [24 CFR 5.603(b), Notice PIH 2009-48]

For purposes of satisfying the community service requirement, an *economic self-sufficiency program* is defined by HUD as any program designed to encourage, assist, train, or facilitate economic independence of assisted families or to provide work for such families.

Eligible self-sufficiency activities include, but are not limited to:

- Job readiness or job training
- Training programs through local one-stop career centers, workforce investment boards (local entities administered through the U.S. Department of Labor), or other training providers
- Employment counseling, work placement, or basic skills training
- Education, including higher education (junior college or college), GED classes, or reading, financial, or computer literacy classes
- Apprenticeships (formal or informal)
- English proficiency or English as a second language classes
- Budgeting and credit counseling
- Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF)
- Any other program necessary to ready a participant to work (such as substance abuse or mental health counseling)

Work Activities [42 U.S.C. 607(d)]

As it relates to an exemption from the community service requirement, *work activities* means:

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training (not to exceed 12 months with respect to any individual)
- Job skills training directly related to employment
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate
- Provision of child care services to an individual who is participating in a community service program

Notification Requirements [24 CFR 960.605(c)(2), Notice PIH 2009-48]

The SFHA must give each family a written description of the community service requirement, the process for claiming status as an exempt person, and the process for SFHA verification of exempt status. The SFHA must also notify the family of its determination identifying the family members who are subject to the service requirement, and the family members who are exempt. In addition, the family must sign a certification, Attachment A of Notice PIH 2009-48, that they have received and read the policy and understand that if they are not exempt, failure to comply with the requirement will result in nonrenewal of their lease.

SFHA Policy

The SFHA will provide the family with a copy of the Community Service Policy found in Exhibit 11-1 of this chapter, at lease-up, lease renewal, when a family member is determined to be subject to the community service requirement during the lease term, and at any time upon the family's request.

On an annual basis, at the time of lease renewal, the SFHA will notify the family in writing of the family members who are subject to the community service requirement and the family members who are exempt. If the family includes nonexempt individuals the notice will include a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which they may record the activities they perform and the number of hours contributed. The form will also have a place for a signature by an appropriate official, who will certify to the activities and hours completed.

11-I.C. DETERMINATION OF EXEMPTION STATUS AND COMPLIANCE [24 CFR 960.605(c)(3)]

The SFHA must review and verify family compliance with service requirements annually at least thirty calendar days before the end of the twelve month lease term. The policy for documentation and verification of compliance with service requirements may be found at Section 11-I.D., Documentation and Verification.

SFHA Policy

Where the lease term does not coincide with the effective date of the annual reexamination, the SFHA will change the effective date of the annual reexamination to coincide with the lease term. In making this change, the SFHA will ensure that the annual reexamination is conducted within 12 months of the last annual reexamination.

Annual Determination

Determination of Exemption Status

An exempt individual is excused from the community service requirement [24 CFR 960.603(a)].

SFHA Policy

At least calendar 60 calendar days prior to lease renewal, the SFHA will review and verify the exemption status of all adult family members. This verification will only be done on an annual basis unless the family reports a change or the SFHA has reason to believe that an individual's exemption status has changed. For individuals who are exempt because they are 62 years of age and older, verification of exemption status will be done only at the initial examination.

Upon completion of the verification process, the SFHA will notify the family of its determination in accordance with the policy in Section 11-I.B., Notification Requirements.

Determination of Compliance

The SFHA must review resident family compliance with service requirements annually at least 30 calendar days before the end of the twelve month lease term [24 CFR 960.605(c)(3)]. As part of this review, the SFHA must verify that any family member that is not exempt from the community service requirement has met his or her service obligation.

SFHA Policy

Approximately 60 calendar days prior to the end of the lease term, the SFHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 15 calendar days to submit the SFHA required documentation form(s).

If the family fails to submit the required documentation within the required timeframe, or SFHA approved extension, the subject family members will be considered noncompliant with

community service requirements, and notices of noncompliance will be issued pursuant to the policies in Section 11-I.E., Noncompliance.

Change in Status between Annual Determinations

SFHA Policy

Exempt to Nonexempt Status

If an exempt individual becomes nonexempt during the twelve month lease term, it is the family's responsibility to report this change to the SFHA within 15 calendar days.

Within 15 calendar days of a family reporting such a change, or the SFHA determining such a change is necessary, the SFHA will provide written notice of the effective date of the requirement, a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which the family member may record the activities performed and number of hours contributed.

The effective date of the community service requirement will be the first of the month following 30 day notice.

Nonexempt to Exempt Status

If a nonexempt person becomes exempt during the twelve month lease term, it is the family's responsibility to report this change to the SFHA within 15 calendar days. Any claim of exemption will be verified by the SFHA in accordance with the policy at 11-I.D., Documentation and Verification of Exemption Status.

Within 15 calendar days of a family reporting such a change, or the SFHA determining such a change is necessary, the SFHA will provide the family written notice that the family member is no longer subject to the community service requirement, if the SFHA is able to verify the exemption.

The exemption will be effective immediately.

11-I.D. DOCUMENTATION AND VERIFICATION [24 CFR 960.605(c)(4)]

The SFHA must retain reasonable documentation of service requirement performance or exemption in participant files.

Documentation and Verification of Exemption Status

SFHA Policy

All family members who claim they are exempt from the community service requirement will be required to sign the community service exemption certification form found in Exhibit 11-3. The SFHA will provide a completed copy to the family and will keep a copy in the tenant file.

The SFHA will verify that an individual is exempt from the community service requirement by following the verification hierarchy and documentation requirements in Chapter 7.

The SFHA makes the final determination whether or not to grant an exemption from the community service requirement. If a resident does not agree with the SFHA's determination, s/he can dispute the decision through the SFHA's grievance procedures (see Chapter 14).

Documentation and Verification of Compliance

At each regularly scheduled reexamination, each nonexempt family member presents a signed standardized certification form developed by the SFHA of community service and self-sufficiency activities performed over the last 12 months [Notice PIH 2009-48].

If qualifying community service activities are administered by an organization other than the SFHA, a family member who is required to fulfill a service requirement must provide certification to the SFHA, signed by the organization, that the family member has performed the qualifying activities [24 CFR 960.607].

SFHA Policy

If anyone in the family is subject to the community service requirement, the SFHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request by the family.

Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying to the number of hours contributed.

Families will be required to submit the documentation to the SFHA, upon request by the SFHA.

If the SFHA has reasonable cause to believe that the certification provided by the family is false or fraudulent, the SFHA has the right to require third-party verification.

11-I.E. NONCOMPLIANCE

Initial Noncompliance

The lease specifies that it is renewed automatically for all purposes, unless the family fails to comply with the community service requirement. Violation of the service requirement is grounds for nonrenewal of the lease at the end of the twelve month lease term, but not for termination of tenancy during the course of the twelve month lease term [24 CFR 960.603(b)].

If the tenant or another family member has violated the community service requirement, the SFHA may not renew the lease upon expiration of the twelve-month term of the lease, unless the tenant and any other noncompliant family member enter into a written agreement with the SFHA. Under this agreement the tenant or noncompliant family member must agree to cure the noncompliance by completing the additional hours of community service or economic self-sufficiency needed to make up the total number of hours required, over the twelve-month term of the new lease. In addition, all other members of the family who are subject to the service requirement must be currently complying with the service requirement or must no longer be residing in the unit [24 CFR 960.607(c), Notice PIH 2009-48].

Notice of Initial Noncompliance [24 CFR 960.607(b)]

If the SFHA determines that there is a family member who is required to fulfill a service requirement, but who has failed to comply with this obligation (noncompliant resident), the SFHA must notify the tenant of this determination.

The notice to the tenant must briefly describe the noncompliance. The notice must state that the SFHA will not renew the lease at the end of the twelve-month lease term unless the tenant, and any other noncompliant resident, enter into a written agreement with the SFHA to cure the noncompliance, or the family provides written assurance satisfactory to the SFHA that the tenant or other noncompliant resident no longer resides in the unit.

The notice must also state that the tenant may request a grievance hearing on the SFHA's determination, in accordance with the SFHA's grievance procedures, and that the tenant may exercise any available judicial remedy to seek timely redress for the SFHA's nonrenewal of the lease because of the SFHA's determination.

SFHA Policy

The notice of initial noncompliance will be sent at least 45 calendar days prior to the end of the lease term.

The family will have 15 calendar days from the date of the notice of noncompliance to enter into a written agreement to cure the noncompliance over the 12 month term of the new lease, provide documentation that the noncompliant resident no longer resides in the unit, or to request a grievance hearing.

If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before the SFHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the family member that previously resided with them.

If the family does not request a grievance hearing, or does not take either corrective action required by the notice of noncompliance within the required 10 business day timeframe, the SFHA will terminate tenancy in accordance with the policies in Section 13-IV.D.

Continued Noncompliance [24 CFR 960.607(b)]

If, after the 12 month cure period, the family member is still not compliant, the SFHA must terminate tenancy of the entire family, according to the SFHA's lease, unless the family provides documentation that the noncompliant resident no longer resides in the unit.

SFHA Policy

Notices of continued noncompliance will be sent at least 30 calendar days prior to the end of the lease term and will also serve as the family's termination notice. The notice will meet the requirements for termination notices described in Section 13-IV.D, Form, Delivery, and Content of the Notice.

The family will have 15 calendar days from the date of the notice of non-compliance to provide documentation that the noncompliant resident no longer resides in the unit, or to request a grievance hearing.

If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before the SFHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the noncompliant family member that previously resided with them.

If the family does not request a grievance hearing, or provide such documentation within the required 15 calendar day timeframe, the family's lease and tenancy will automatically terminate at the end of the current lease term without further notice.

Enforcement Documentation [Notice PIH 2009-48]

PHAs are required to initiate due process (see 24 CFR 966.53(c)) against households failing to comply with lease requirements including the community service and self-sufficiency requirement.

When initiating due process, the SFHA must take the following procedural safeguards:

- Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
- Right of the tenant to be represented by counsel

- Opportunity for the tenant to refute the evidence presented by the SFHA, including the right to confront and cross-examine witnesses and present any affirmative legal or equitable defense which the tenant may have
- A decision on merits

PART II

IMPLEMENTATION OF COMMUNITY SERVICE

11-II.A. OVERVIEW

Each SFHA must develop a policy for administration of the community service and economic self-sufficiency requirements for public housing. It is in the SFHA's best interests to develop a viable, effective community service program, to provide residents the opportunity to engage in the community and to develop competencies.

SFHA Implementation of Community Service

The SFHA may not substitute any community service or self-sufficiency activities performed by residents for work ordinarily performed by SFHA employees, or replace a job at any location where residents perform activities to satisfy the service requirement [24 CFR 960.609].

SFHA Policy

The SFHA will notify its insurance company if residents will be performing community service at the SFHA. In addition, the SFHA will ensure that the conditions under which the work is to be performed are not hazardous.

If a disabled resident certifies that s/he is able to perform community service, the SFHA will ensure that requests for reasonable accommodation are handled in accordance with the policies in Chapter 2.

SFHA Program Design

The SFHA may administer qualifying community service or economic self-sufficiency activities directly, or may make community service activities available through a contractor, or through partnerships with qualified organizations, including resident organizations, and community agencies or institutions [24 CFR 960.605(b)].

SFHA Policy

The SFHA will attempt to provide the broadest choice possible to residents as they choose community service activities.

The SFHA's goal is to design a service program that gives residents viable opportunities to become involved in the community and to gain competencies and skills. The SFHA will work with resident organizations and community organizations to design, implement, assess and recalibrate its community service program.

The SFHA will make every effort to identify volunteer opportunities throughout the community, especially those in proximity to public housing developments. To the greatest extent possible, the SFHA will provide names and contacts at agencies that can provide opportunities for residents, including persons with disabilities, to fulfill their community service obligations.

Any written agreements or partnerships with contractors and/or qualified organizations, including resident organizations, are described in the SFHA Plan.

The SFHA will provide in-house opportunities for volunteer work or self-sufficiency programs when possible.

When the SFHA has a ROSS program, a ROSS Service Coordinator, or an FSS program, the SFHA will coordinate individual training and service plans (ITSPs) with the community service requirement. Regular meetings with SFHA coordinators will satisfy community service activities and SFHA coordinators will verify community service hours within individual monthly logs.

EXHIBIT 11-1: COMMUNITY SERVICE AND SELF-SUFFICIENCY POLICY

A. Background

The Quality Housing and Work Responsibility Act of 1998 requires that all nonexempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes or other activities that help an individual toward self-sufficiency and economic independence. This is a requirement of the public housing lease.

B. Definitions

Community Service – community service activities include, but are not limited to, work at:

- Local public or nonprofit institutions such as schools, head start programs, before or after school programs, child care centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing)
- Nonprofit organizations serving SFHA residents or their children such as: Boy or Girl Scouts, Boys or Girls Club, 4-H clubs, Police Assistance League (PAL), organized children's recreation, mentoring or education programs, Big Brothers or Big Sisters, garden centers, community clean-up programs, beautification programs
- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels
- Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods, or performing arts
- SFHA housing to improve grounds or provide gardens (so long as such work does not alter the SFHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board
- Care for the children of other residents so parent may volunteer

Note: Political activity is excluded.

Self-Sufficiency Activities – self-sufficiency activities include, but are not limited to:

- Job readiness or job training
- Training programs through local one-stop career centers, workforce investment boards (local entities administered through the U.S. Department of Labor), or other training providers
- Employment counseling, work placement, or basic skills training
- Education, including higher education (junior college or college), GED classes, or reading, financial, or computer literacy classes
- Apprenticeships (formal or informal)

- English proficiency or English as a second language classes
- Budgeting and credit counseling
- Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF)
- Any other program necessary to ready a participant to work (such as substance abuse or mental health counseling)

Exempt Adult – an adult member of the family who meets any of the following criteria:

- Is 62 years of age or older
- Is blind or a person with disabilities (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability he or she is unable to comply with the service provisions, or is the primary caretaker of such an individual
- Is engaged in *work activities*
- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the SFHA is located, including a state-administered welfare-to-work program; or
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the SFHA is located, including a state-administered welfare-to-work program, and has not been found by the state or other administering entity to be in noncompliance with such program.

Work Activities – as it relates to an exemption from the community service requirement, *work activities* means:

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training (not to exceed 12 months with respect to any individual)
- Job skills training directly related to employment
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate

- Provision of child care services to an individual who is participating in a community service program

C. Requirements of the Program

1. The eight (8) hours per month may be either volunteer work or self-sufficiency program activity, or a combination of the two.
2. At least eight (8) hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant special consideration. The SFHA will make the determination of whether to allow or disallow a deviation from the schedule based on a family's written request.
3. Family obligation:
 - At lease execution, all adult members (18 or older) of a public housing resident family must:
 - Sign a certification (Attachment A) that they have received and read this policy and understand that if they are not exempt, failure to comply with the community service requirement will result in a nonrenewal of their lease; and
 - Declare if they are exempt. If exempt, they must complete the Exemption Form (Exhibit 11-3) and provide documentation of the exemption.
 - Upon written notice from the SFHA, nonexempt family members must present complete documentation of activities performed during the applicable lease term. This documentation will include places for signatures of supervisors, instructors, or counselors, certifying to the number of hours contributed.
 - If a family member is found to be noncompliant at the end of the 12-month lease term, he or she, and the head of household, will be required to sign an agreement with the housing authority to make up the deficient hours over the next twelve (12) month period, or the lease will be terminated.
4. Change in exempt status:
 - If, during the twelve (12) month lease period, a nonexempt person becomes exempt, it is his or her responsibility to report this to the SFHA and provide documentation of exempt status.
 - If, during the twelve (12) month lease period, an exempt person becomes nonexempt, it is his or her responsibility to report this to the SFHA. Upon receipt of this information the SFHA will provide the person with the appropriate documentation form(s) and a list of agencies in the community that provide volunteer and/or training opportunities.

D. SFHA Obligation

1. To the greatest extent possible and practicable, the SFHA will:
 - Provide names and contacts at agencies that can provide opportunities for residents, including residents with disabilities, to fulfill their community service obligations.
 - Provide in-house opportunities for volunteer work or self-sufficiency activities.

2. The SFHA will provide the family with a copy of this policy, and all applicable exemption verification forms and community service documentation forms, at lease-up, lease renewal, when a family member becomes subject to the community service requirement during the lease term, and at any time upon the family's request.
 3. Although exempt family members will be required to submit documentation to support their exemption, the SFHA will verify the exemption status in accordance with its verification policies. The SFHA will make the final determination as to whether or not a family member is exempt from the community service requirement. Residents may use the SFHA's grievance procedure if they disagree with the SFHA's determination.
4. Noncompliance of family member:
- At least thirty (30) calendar days prior to the end of the 12-month lease term, the SFHA will begin reviewing the exempt or nonexempt status and compliance of family members:
 - The SFHA will secure a certification of compliance from nonexempt family members (Attachment B).
 - If, at the end of the initial 12-month lease term under which a family member is subject to the community service requirement, the SFHA finds the family member to be noncompliant, the SFHA will not renew the lease unless:
 - The head of household and any other noncompliant resident enter into a written agreement with the SFHA, to make up the deficient hours over the next twelve (12) month period; or
 - The family provides written documentation satisfactory to the SFHA that the noncompliant family member no longer resides in the unit.
 - If, at the end of the next 12-month lease term, the family member is still not compliant, a 30-day notice to terminate the lease will be issued and the entire family will have to vacate, unless the family provides written documentation satisfactory to the SFHA that the noncompliant family member no longer resides in the unit;
 - The family may use the SFHA's grievance procedure to dispute the lease termination.

I. Need for Measures to Ensure the Safety of Public Housing Residents

The SFHA manages over 4,000 units in San Francisco. Family developments and Senior/Disabled buildings face different safety and crime prevention concerns. For example while family developments may have severe violence such as homicides and burglaries, senior developments are increasingly ridden with resident reports of drug dealers and assaults. While crime has decreased, the SFHA is committed to ensuring the safety of Public Housing Residents, which is reflected in sections II and III below.

II. Description of Crime Prevention Activities Conducted

The SFHA has a need to provide security at its family and senior/disabled sites. In 2012 the SFHA was awarded a \$250,000 grant to be used towards security at various developments. The funds were utilized to provide camera's at two of the SFHA's largest developments, Sunnydale and Alice Griffith. Alice Griffith has seen a 36% decrease in criminal activity since the installation of the cameras... Since 2012, the SFHA has applied for the safety and security grant applications on two occasions and has not been selected either time.

An audit of all cameras was conducted in 2013. Those cameras that were in need of service have been serviced and are running. Additionally, the SFHA placed cameras in Potrero Terrace and Annex, where violence had increased and resident safety was a priority. In 2015 the Board of Commissioners approved funding for additional cameras at Robert B. Pitts and Ping Yuen where increases in violence were substantiated by Police Department requests for cameras.

The SFHA also has ramped up security after ending its concierge program. The SFHA currently maintains a contract with two private security companies who patrol all of the SFHA's senior/disabled developments.

The SFHA attends a weekly meeting with the Street Violence Response Team, facilitated through the Mayor's Office of San Francisco where crime is reported, analyzed and strategies implemented to prevent crime that may result as retaliation. The SFHA has also begun meeting with the San Francisco District Attorney's office to discuss witness protection programs and discourse and has provided a training to their staff on SFHA policies.

Lastly, the SFHA has established a new gun policy as part of this five (5) year Plan:

Firearm Policy

The SFHA has an important and substantial interest in protecting the health, safety, and welfare of its residents, their guests, its employees, and the public at large while on SFHA property. While Public Housing residents have a second amendment right to bear legal firearms in their public housing unit, the SFHA may place reasonable restrictions on these rights for the safety of others.

SFHA Policy

The SFHA will allow lawful ownership, lawful possession and lawful transportation of firearms, ammunition, weapons and other lawful items and devices for which proper registration and/or permits are provided.

Any tenant in lawful possession of a firearm must:

(1) Obtain a "Firearm Safety Certificate" issued by the California Department of Justice ("DOJ"). The "Firearm Safety Certificate" demonstrates basic familiarity with those firearms, including but not limited to, the safe handling and storage of those firearms. Proof of exemption pursuant to California Penal Code section 31700 must be provided if the Firearm Safety Certification was not obtained.

(2) Provide a safe storage space, with a lock, for the lawful firearm;

(3) Provide proof of a firearm safety course having occurred within 90 calendar days of having received the firearm safety certificate; and

(4) Not sell the firearm unless conducted through a fully licensed California arms dealer.

The "Firearm Safety Certificate"; proof of safe storage and proof of having completed a firearm safety course are required to be submitted to the property office within 100 calendar days of receipt of the Firearm Safety Certificate. These documents shall be stored in the tenant file.

A resident, guest, employee or any other individual or group do not have the right to possess and/or use firearms in the common area of any public housing development. A resident must make available a copy of any permit required by state, federal, or local law upon request when there is reasonable cause to believe that the law or the firearms policy has been violated.

Residents may not carry a concealed firearm on their person in public unless they have a valid Carry Concealed Weapon (CCW) license. CCW licenses are issued only by a California county sheriff to residents of the county, or the chief of police to residents of the city. California law does not honor or recognize CCW licenses issued outside this state. (Pen. Code sections 25400-25700, 26150-26225.)

The SFHA has a zero tolerance policy for unlawful weapons and will take strict lease enforcement action against any tenant found in unlawful possession of firearms in accordance with this Chapter.

In the event that a firearm is stolen, the resident who is the legal owner must file a police report and provide a copy of the report, or the incident report number to the SFHA property manager within five (5) calendar days of the theft.

Illegal possession, use or sale of a firearm will result in a three (3) day notice to the household. Removal of the party who had the illegal possession, use or sale of the firearm will not terminate eviction proceedings against the household.

III. Coordination of the SFHA with the San Francisco Police Department

The SFHA has a Memorandum of Understanding with the San Francisco Police Department which provides the SFHA with a certain number of dedicated officers at the family developments. It also provides the SFHA with a liaison, usually a Commander, who is the contact for any questions that the SFHA may have about a recent crime or investigation that occurred. The SFHA meets quarterly with the San Francisco Police Department to discuss trends in violence and strategies to address the trends. The Commander reports to the Resident Services, Operations and Personnel Committee once per month and provides the public with monthly crime reports of all of the SFHA properties. Further, Captains of the San Francisco Police Departments meet with resident groups upon request.

The SFHA continues to work with city officials and the San Francisco Police Department to allocate additional resources and to increase patrolling of the other developments and explore new ways to increase security and reduce crime in and around our developments.

903.7-3 Pets

The SFHA has a no pet policy. The ownership of specified animals is restricted to seniors and the disabled pursuant to Federal and State guidelines. The SFHA pet policy was developed with the input of residents and the Resident Advisory Board and is located in the ACOP.

903.7-4 Civil Rights Certification

The SFHA certifies that it is carrying out the five year plan in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990. The SFHA will affirmatively further fair housing. The SFHA is in compliance with the certification requirement to affirmatively further fair housing pursuant to 24 CFR section 903.2(b) with its "Deconcentration" policy located in Chapter 4 of the ACOP and HCV Admin Plan.

903.7-5 Fiscal Year Audit

The SFHA is required to have an audit conducted under section 5(h) (2) of the U.S. Housing Act of 1937 (42 U. S. C. 1437c (h)) and will submit the most recent fiscal audit to HUD. (**See Attachment 3**)

903.7-6 Asset Management

The SFHA is performing asset management functions for the public housing inventory by monitoring development-based financial reports and key property management indicators on a monthly basis. Site visits are conducted and reports are provided monthly by the property managers on activities occurring at the development. Capital investment needs are monitored on a monthly basis to prioritize urgency and need.

903.7-7) Violence Against Women Act (VAWA)

The SFHA, in response to the Violence Against Woman Act (VAWA), has updated both its ACOP and Admin Plan to reflect the changes made in the 2013 Reauthorization of VAWA.

The SFHA allows residents who are victims of domestic violence, dating violence, sexual assault, or stalking to maintain their housing by: (1) allowing residents to request a transfer if in a Public Housing unit; and (2) termination of eviction proceedings when the cause is not the fault of the victim.

In 2014, the SFHA and the Department of the Status of Women, obtained funding from the City and County of San Francisco to hire two Domestic Violence Liaisons. The funding is currently being administered through the Department of the Status of Women and awarded to La Casa de las Madres. In January of 2015, the SFHA provided office space to both Liaisons, notified all Public Housing Residents of the services provided by the Liaisons, and issued a press release notifying the public of the new services available at 1815 Egbert Avenue, San Francisco, California. The liaisons serve to connect residents who are victims of domestic violence, dating violence, sexual assault and stalking, to services available at the SFHA or through the City and County of San Francisco.

The SFHA meets bimonthly with Domestic Violence Advocate groups including, but not limited to La Casa De Las Madres, the Department on the Status of Women, Bay Area Legal Aid, National Housing Law Project, etc. Community based advocates provided training on domestic violence to SFHA staff in June 2014 and June 2015.

The SFHA meets bimonthly with Domestic Violence Advocate groups including, but not limited to La Casa De Las Madres, the Department of the Status of Women, Bay Area Legal Aid, National Housing Law Project, etc.

7.0 - Hope VI, Mixed Finance Modernization Or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-Based Vouchers.

Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.

Plan Describing the Capital Improvements Necessary to Ensure Long-term Physical and Social Viability of the Projects

This Narrative sets forth the San Francisco Housing Authority (SFHA) overall plan for modernization, new construction, and revitalization of public housing with highlights of the 2016 Capital Fund Program (CFP) and Replacement Housing Factor (RHF) program. The SFHA has involved residents, community representatives and City agencies throughout this planning process.

Mixed Finance Development

The SFHA has developed revitalization and replacement housing plans for eleven sites that it manages. The extent of the physical problems, the inappropriateness of site and building design, obsolescence of systems and limited funding for modernization makes revitalization an appropriate long-term strategy. In addition, the relatively low density of these sites provides an opportunity for redevelopment into mixed income communities that include one-for-one replacement of the public housing. The SFHA will pursue partnerships with developers and city agencies and secure funding including Replacement Housing Factor, HOPE VI, other HUD funding, private financing, and State and local funding for these mixed-finance developments. The SFHA also plans to use the project-based voucher program as part of the financing for approximately forty percent of the replacement public housing units. The SFHA has had enormous success with this strategy at five HOPE VI sites that now have new public housing in developments with a total of 1,148 mixed-income units.

The SFHA released Requests for Qualifications for developers to rebuild these sites in 2003 and 2007. In the fall of 2006, San Francisco's Mayor Gavin Newsom and Supervisor Sophie Maxwell selected a broad-based task force to provide recommendations for addressing conditions in San Francisco's most distressed public housing while also enhancing the lives of its current residents based on the successful HOPE VI model.

The SFHA identified for redevelopment seven obsolete and dilapidated low density family sites with potential for one-for-one replacement of the public housing plus other affordable, first-time homebuyer, and market housing. These sites include Hunters View, Alice Griffith, Potrero Terrace, Potrero Annex, Sunnydale, Velasco, and Westside Courts. The revitalization of these communities is a priority for the City's Consolidated Plan, the Housing Element, and the Mayor's HOPE SF Task Force.

The HOPE SF Task Force developed the guidelines outlined below as major initiatives for funding, collaboration, and partnership. The SFHA's revitalization and disposition priorities are consistent with these guidelines.

HOPE SF Task Force Vision

"To rebuild our most distressed public housing sites, while increasing affordable housing and ownership opportunities, and improving the quality of life for existing residents and the surrounding communities"

HOPE SF Task Force Principles

1. Ensure No Loss of Public Housing:
2. Create an Economically Integrated Community:
3. Maximize the Creation of New Affordable Housing:
4. Involve Residents in the Highest Levels of Participation in Entire Project:
5. Provide Economic Opportunities Through the Rebuilding Process:
6. Integrate Process with Neighborhood Improvement Plans:
7. Create Environmentally Sustainable and Accessible Communities:
8. Build a Strong Sense of Community:

HOPE SF Task Force Strategies for Funding

The SFHA along with the San Francisco Mayor's Office of Housing have analyzed this rebuilding opportunity to determine the financial feasibility of the approach outlined by the Task Force. Below are the assumptions and resulting cost projects and financing gaps.

Key Financial Assumptions:

- All of the public housing would be rebuilt on-site;
- Rebuilding would occur in phases so that relocation could occur on-site;
- Market-rate housing would cross-subsidize the rebuilding of the public housing;
- The developments would be rebuilt to 40 units per acre or more depending on the density of the surrounding neighborhood; and
- The final mix of housing on the sites would be approximately 40% public housing, 40% market-rate and 20% affordable rental and ownership housing

HOPE SF Key Next Steps

These are the next steps to be undertaken to move this plan forward and address the most blighted and obsolescent sites:

1. Expand the outreach and education process with public housing residents and other stakeholders.
2. Seek \$100 to \$200 million in new local funding for an aggressive second phase of HOPE SF.
3. Secure funding for services, outreach, job training and school improvement independently of individual project financing.

Hunters View

The SFHA in partnership with the City and County of San Francisco (the "City"), through its HOPE SF Program initiated the revitalization of the Hunters View Public Housing Development in 2005. The SFHA approved the Master Development Agreement for the Development (as described below) in 2009.

The Development will be constructed in three phases and consists of (i) the demolition of the original two hundred and sixty- seven (267) public housing apartment units on the Property; and (ii)(a) the new construction of two hundred and sixty-seven (267) replacement public housing units, plus up to an additional five hundred and thirty-three (533) mixed income housing units, (b) the construction of off street parking, new roadways, and sidewalks, (c) the construction of up to six thousand five hundred (6,500) square feet of neighborhood servicing retail space, and (d) the construction of up to eight thousand five hundred (8,500) square feet of child care space, community parks, and landscaping.

Phase I of the Development was completed in 2013 with the demolition of a portion of the existing Hunters View buildings, and the construction of 107 rental housing units and public improvements, including new open space and pathway area and new street improvements. Phase II is divided into three sub-phases, including Phase IIA(1), Phase IIA(2) and Phase IIB.

Alice Griffith:

The Alice Griffith Public Housing Project will be rebuilt with one-for-one replacement of 256 public housing units and an additional 248 additional tax credit affordable units (the "Alice Griffith Replacement Housing Project"). The Alice Griffith Replacement Project is a portion of the Housing Plan of the Candlestick Point and Phase 2 Hunters Point Shipyard Project, being developed by CP Development Co., LP, pursuant to that certain Disposition and Development Agreement dated June 3, 2010 between the Master Developer and the former Redevelopment Agency of the City and County of San Francisco, now the Office of Community Investment and Infrastructure (the "Agency" or "OCII")) (the "Agency DDA").

The Housing Plan of the DDA include an additional 382 market-rate units, 43 inclusionary units (affordable to households up to 120% of Area Median Income (AMI)), and 281 workforce units (affordable to households earning more than 120% of AMI, but priced below market.) for a total of

1,210 units to be developed in the 5 phases of the Candlestick Point and Phase 2 Hunters Point Shipyard Project.

On October 14, 2010 the Board of Commissioners of the Housing Authority of the City and County of San Francisco, (Board) authorized the SFHA to enter into an Exclusive Negotiating Rights Agreement (ENRA) with the Master Developer and McCormack Baron Salazar, Inc. (MBS) to redevelop Alice Griffith Housing Development. The rights of the Master Developer and MBS under the ENRA were subsequently assigned to Double Rock Ventures, LLC, an affiliate of MBS (Developer), to develop a revitalization plan for Alice Griffith Public Housing ("Alice Griffith").

In 2010, the SFHA became the co-applicant with MBS in applying to HUD for a Choice Neighborhoods Initiative (CNI) implementation grant. In 2011, HUD awarded the Alice Griffith Housing Development \$30,500,000. The goals of CNI include replacing distressed public and assisted housing with high-quality, mixed-income housing that is integrated in the neighborhood; supporting public and private investment in distressed neighborhoods to offer amenities and assets that are important to families; and improving educational outcomes and intergenerational mobility for youth with services and supports delivered directly to youth and their families.

This development adheres to all of the HOPE SF principles in the revitalization of this severely distressed property and meets the CNI goals, transforming it into a 504-unit, mixed-income community that complements and builds upon existing neighborhood assets and local revitalization efforts underway in the area, as part of the larger Candlestick Point revitalization plan. City partners working on various parts of neighborhood asset building include the San Francisco Unified School District, Office of Economic and Workforce Development, Department of Children, Youth and their Families, Department of Public Health, the Human Services Agency, First Five, and the San Francisco Police Department.

Demolition and/or Disposition

The City, SFHA staff and representatives of 72 different community organizations, met over a four-month period to develop recommendations as part of the re-envisioning plan for the SFHA. Consistent with the implementation of part of those recommendations, SFHA and City staffs, including the Mayor's Office, the Mayor's Office of Housing and Community Development, the City Administrator, and the SFHA's Acting Executive Director have developed this financing strategy to address the long term viability of the SFHA housing portfolio in light of reduced current and future federal funding for capital improvements and operations.

The proposed financing strategy seeks to address critical immediate and long term rehabilitation needs and preserve affordability for very low income residents by increasing revenue and by attracting new capital.

As part of the fiscal strategy plan, it is critical for the SFHA to leverage all available federal dollars by applying for applicable United States Department of Housing and Urban Development ("HUD") programs. The plan includes applying for Project Based Rental Assistance and/or Project-Based Vouchers under the federal Rental Assistance Demonstration Program ("RAD"), which application was approved by the SFHA Board of Commissioners on September 26, 2013 and the application(s) submitted on September 27, 2013. In addition to the RAD applications, the financing strategy as contemplated by the Plan relies also upon HUD's Section 18 Disposition/Demolition program which will permit the SFHA to obtain additional Section 8 vouchers under the RAD program. The SFHA intends to develop the projects as mixed finance projects and use Section 8 vouchers, plus additional funds from private funding source, equity partners under the low income housing tax credit program and other eligible sources. Such an approach will allow the tenants of SFHA sites to benefit from immediate and long term rehabilitation work while preserving existing affordability.

HUD Section 18 Disposition Program

HUD's Section 18 Disposition program allows the conversion of properties that are found to be economically or functionally obsolete, to mixed finance developments, as a method to leverage non-federal funds into the properties. Properties are economically obsolete and eligible for disposition if the rehabilitation costs are in excess of approximately 62% of HUD's estimate of new construction cost (depending upon construction type) and may not be able to leverage the additional capital necessary to meet RAD requirements for useful life.

Properties are functionally obsolete if they do not meet certain building code standards (including accessibility) or other marketability standards such as the number of bathrooms, sizes of bedrooms and living rooms, suitability of the property site, and location. Tenant Protection Vouchers ("TPVs") are available by HUD under separate application to ensure that a disposition does not harm the tenants. Such vouchers are issued directly to eligible tenants to prevent such tenants from losing any rental assistance.

The SFHA is proposing a large scale redevelopment plan to reposition substantially all of its portfolio by disposing of certain public housing projects under 24 CFR part 970, receiving tenant protection vouchers (TPVs) in support of the disposition action, converting projects through HUD's Rental Assistance Demonstration (RAD) Program, and utilizing Choice Neighborhoods grants (Redevelopment Plan). Because of the complexities and scale of the redevelopment plan, the SFHA requested and was granted waivers under the RAD statutory authority on February 13, 2015 to Section 8(0)(13)(B) of the U.S. Housing Act of 1937 (1937 Act), certain other provisions governing project-based voucher (PBV) assistance and Notice PIH 2012-7, Section 10. The waiver of section 8(0)(13)(B) allows the SFHA to project-base the TPV assistance it receives through the proposed disposition in connection with its RAD conversions. The waiver of Notice PIH 2012-7, Section 10, allows the SFHA to dispose of the

Developments under 24 CFR § 970.17 (c) by certifying that the SFHA has insufficient public housing Capital and Operating Funds to implement the redevelopment plan even with alternative resources such as RAD and Choice Neighborhoods grants. The waiver of Notice PIH 2012-7 was granted based on analysis and criteria stated in the waiver, including without limitation evaluation of other alternatives for redevelopment, considering the displacement of current residents and the loss of assisted units, the size and complexity of the plan and the effectiveness and efficiencies of the SFHA's operations as a result of implementation. The following public housing projects are proposed for Section 18 subsequent disposition (the "Section 18 Sites"):

1. Ping Yuen
2. Ping Yuen North
3. Westside Courts
4. Rosa Parks
5. Alemany
6. Hunters Point East/West
7. Westbrook Apartments
8. 350 Ellis

Financing

The goal is to improve housing conditions for as many residents as possible. The combination of the above financing with a public land trust (evidenced by a long-term ground lease) and local developers is the public private partnership consistent the SFHA's re-envisioning report. This structure ensures the long term affordability and oversight of the housing through the land lease structure; access to new funds not available to the SFHA; and improved housing conditions for residents.

Disposition of Other Sites – Properties with Underutilized Portions of Land

- Rosa Parks, AMP 978, open parking area adjacent to the 198 public housing units – long term ground lease for development of housing for senior and/or disabled households 2009-2012.
- 101-103 Lundy's Lane, AMP 982. The SFHA has determined that the disposition of this 1 unit site will allow for the rehabilitation of other properties that will be more efficiently and effectively operated as low-income housing developments.
- 440 Turk Street, AMP 987. The SFHA has determined that the disposition of the non-dwelling administrative offices at 440 Turk Street will allow for the rehabilitation and more efficient and effective operation of its properties. Disposition of 440 Turk will not interfere with the continued operation of the remaining portion of the Development, the senior/disabled public housing located at 430 Turk.

Conversion of Public Housing under HUD Rental Assistance Demonstration Program

On January 6, 2014, the US Department of Housing and Urban Development (“HUD”) provided approval of applications that were submitted by the SFHA on September 27, 2013, under the Rental Assistance Demonstration (“RAD”) Program for 4,575 housing units in 41 SFHA projects. The RAD program offers the opportunity for the SFHA to preserve its housing units as affordable housing for the long-term, and to rehabilitate and recapitalize projects in a manner that will maintain the physical and economic viability of the developments for at least 20 years. The conversion to RAD addresses the long term viability of the SFHA housing portfolio in light of reduced current and future federal funding for capital improvements and operations. Through this innovative program, the SFHA seeks to improve the residents’ quality of life, to provide supportive services and employment opportunities for its residents and to participate in any revenues or income streams produced by the newly upgraded and refinanced housing through annual ground lease payments.

Consistent with the findings of the San Francisco Public Housing Re-Envisioning process and July 2013 Report, the SFHA seeks to address critical immediate and long term rehabilitation needs and preserve affordability for very low income public housing residents by increasing revenue and by attracting new capital to sustain the SFHA’s public housing projects.

As such, on September 26, 2013, the SFHA Board authorized the Acting Executive Director to submit a portfolio-wide application to HUD to convert 4,575 existing units to RAD in 41 SFHA projects that are currently subsidized by the Annual Contributions Contract (“ACC”). See chart below for the list of 41 projects, which are split into Year One and Year Two projects, and are further divided into eight Clusters according to geographic location and building type (e.g., senior/disabled or family sites).

Description of Units to be Converted:

	AMP	Pre-conversion type	0 BR	1BR	2BR	3BR	4BR	5BR	6BR	Total Units Pre-conversion	
Phase I											
ORIGINAL COUNT IN RAD APPLICATION AND CHAP											
227 Bay	972	General	48	2						50	
990 Pacific	976	General	74	18						92	
Robert B Pitts - 1150 Scott	988	General			77	112	12			201	
939 and 951 Eddy	987	General	36	1	22	3				61	
666 Ellis	981	General	77	22						99	
430 Turk	987	General	69	19	1					89	
Holly Courts - 100 Appleton	966	General		48	60	10				118	
25 Sanchez	986	General	75	15	—					90	
42 Duboce	986	General	34	8						42	
255 Woodside	979	General	87	22						109	
491 31st Avenue	986	General	66	8	1					75	
345 Arguello	986	General	59	9	1					69	
1880 Pine	977	General	97	15	1					113	
Hunters Point EW	973	General	0	17	122	35	29	9	1	213	
Plaza East	963	General		18	105	50	20			193	
Bernal Dwellings	962	General		3	85	71	1			160	
Hayes Valley North	960	General			29	18	4			51	
Halley Valley South	961	General		12	43	7	4			66	
North Beach	990	General		20	77	36	5			138	
<i>Total Original Count In CHAP</i>			72	3	203	290	159	40	9	1	2033

	AMP	Pre-conversion type	0 BR	1BR	2BR	3BR	4BR	5BR	6BR	Total Units Pre-conversion
Phase II										
ORIGINAL COUNT IN RAD APPLICATION AND CHAP										
Ping Yuen	972	General		46	91	76	21			234
Ping Yuen North	976	General	45	33	100	22				200
Westside Courts	969	General		84	24	20	8			136
1750 McAllister	985	General	75	21	1					97

Rosa Parks	978	General	19	100	77		2			198
350 Ellis	981	General	72	24						96
320-330 Clementina	983	General	22	50						276
6										
Alemany Apartments	966	General		14	96	46	2			158
3850 18th St.	982	General	88	19						107
Mission Dolores	980	General	68	23	1					92
1760 Bush	977	General	83	24	1					108
Kennedy Towers	984	General	76	22						98
2698 California	984	General	31	8	1					40
Westbrook Apartments	970	General		4	60	116	34	12		226
Hunters View 1	989	General		3	25	18	7	1		54
Hunters View 2A	974	General			23	38	19			80
Hunters View 2B	974	General								0
Alice Griffith	975	General		8	131	24	76	17		256
Valencia Gardens	991	General		18	62	60	8			148
<i>Total Original Count In CHAP</i>			78 3	501	693	420	177	30	0	2604

	AMP	Pre-conversion type	0 BR	1BR	2BR	3BR	4BR	5BR	6BR	Total Units Pre-conversion
Planned for Future Applications Count in PIC										
Potrero Terrace	967	General		26	387	56				469
Potrero Annex	967	General		25	47	55	18	5		150
Sunnydale	968	General		75	509	140	31	2		757
Velasco	968	General	5	8	5					18
San Jule Apts.	978	General				8				8
363 Noe	980	General	19	3						22
Lundy's Lane	982	General				2				2
Great Highway	985	General			6	10				16
200 Randolph	985	General			8	6	2			16
4101 Noriega	985	General			3	3	2			8
<i>Total Original Count In PIC</i>			24	137	965	280	53	7	0	1466

San Francisco RAD Phase I -
Unit Mix pre- and post-RAD Conversion

	AM P	Pre- conversi on type	Post- conversi on type	0 BR	1B R	2B R	3B R	4B R	5B R	6B R	Total Units Pre- conversion	Capital Fund allocation of Developme nt:	Notes:
<i>Total Original Count In RAD Application</i>				72 3	20 4	28 9	15 9	40	9	1			

ORIGINAL COUNT IN RAD APPLICATION AND CHAP

227 Bay	972	General	Sr/Disabl ed	48	3						51	\$86,818.32	
990 Pacific	976	General	Sr/Disabl ed	74	18						92	\$156,613.44	
Robert B Pitts - 1150 Scott	988	General	Family			78	11 4	11			203	\$399,207.62	
939 and 951 Eddy	987	General	Sr/Disabl ed	36		24					60	\$95,066.40	
666 Ellis	981	General	Sr/Disabl ed	77	23						100	\$149,505.00	
430 Turk	987	General	Sr/Disabl ed	69	19	1					89	\$141,015.16	
Holly Courts - 100 Appleton	966	General	Family		48	60	10				118	\$199,451.86	
25 Sanchez	986	General	Sr/Disabl ed	75	14	1					90	\$134,197.20	
42 Duboce	986	General	Sr/Disabl ed	34	8						42	\$62,625.36	
255 Woodside	979	General	Sr/Disabl ed	87	22	1					110	\$162,917.70	
491 31st Avenue	986	General	Sr/Disabl ed	66	9						75	\$111,831.00	
345 Arguello	986	General	Sr/Disabl ed	59	9	1					69	\$102,884.52	
1880 Pine	977	General	Sr/Disabl	98	14	1					113	\$169,084.16	

			ed											
Hunters Point EW	973	General	Family	0	17	12 2	35	29	9	1	213	\$382,447.89		
<i>Total Original Count In CHAP</i>				72 3	20 4	28 9	15 9	40	9	1	1425	\$2,353,665. 63	TOTAL	
ACTUAL UNIT COUNT ON SITE														<i>Explain discrepancy from RAD and CHAP.</i>
227 Bay	972			48	2									<i>Through site investigatio n it was determined that a unit was converted to a community room but not changed in PIC.</i>
990 Pacific	976			74	18									
Robert B Pitts - 1150 Scott	988					77	11 3	11						<i>Original PIC was 77- 113-11. Was changed in RAD app and CHAP to 78-114- 11. Reverting to original</i>

															<i>count as the offline units are critical community spaces (one 2-bdrm for resident council and one 3-bdrm for maintenan ce storage)</i>
939 and 951 Eddy	987			36	2	21	1								
666 Ellis	981			77	22										<i>One unit currently being used as storage will be converted to supportive services space</i>
430 Turk	987			69	19	1									
Holly Courts - 100 Appleton	966				46	60	10								<i>2 units were offline as office space for the resident council and for another unspecified</i>

PROPOSED ADJUSTMENTS BASED ON REHAB

DESIGN

***If subtracting from any unit count enter unit as negative number. Any additions should be positive in the appropriate bedroom mix**

Robert B Pitts - 1150 Scott	988											
939 and 951 Eddy	987											
666 Ellis	981											
430 Turk	987											1 new Manager Office on ground floor; no residential units converted
Holly Courts - 100 Appleton	966				2							Adding back two offline units
25 Sanchez	986											
42 Duboce	986											
255 Woodside	979					(1)						2BR being converted to property management and service coordinator space.
491 31st Avenue	986											
345 Arguello	986											
1880 Pine	977											
Hunters Point EW	973						1					Renovating dilapidated (inaccessible) community

												space into residential unit.
NEW Services Space												
227 Bay	972											
990 Pacific	976											
Robert B Pitts - 1150 Scott	988											
939 and 951 Eddy	987											Build out of services space in vacant, underutilized storage space.
666 Ellis	981											Manager unit, previously used for storage, is being converted into services space.
430 Turk	987											2 new services offices on ground floor; no residential units converted
Holly Courts - 100	966											

Appleton												
25 Sanchez	986											
42 Duboce	986											
255 Woodside	979											
491 31st Avenue	986											Reconfiguring existing office area for service space
345 Arguello	986											Reconfiguring existing office area for service space
1880 Pine	977											Reconfiguring existing office area for service space
Hunters Point EW	973					(1)						
NEW Onsite Manager's Unit												
227 Bay	972				(1)							
990 Pacific	976				(1)							
Robert B Pitts - 1150 Scott	988					(2)						Two 2-bdrm units for onsite managers.
939 and 951 Eddy	987											Existing manager's unit to remain a manager's unit.

666 Ellis	981												
430 Turk	987												No change to identified manager's unit.
Holly Courts - 100 Appleton	966					(1)							
25 Sanchez	986				(1)								
42 Duboce	986				(1)								
255 Woodside	979				(1)								
491 31st Avenue	986				(1)								
345 Arguello	986				(1)								
1880 Pine	977				(1)								
Hunters Point EW	973				(1)	(1)							
NEW Community space													
227 Bay	972												
990 Pacific	976												
Robert B Pitts - 1150 Scott	988												No change. Offline spaces for resident council(2-bdrm) and maintenance (3-bdrm) will remain.
939 and 951 Eddy	987												Build out of new community room in vacant, underutiliz

													ed storage room.
666 Ellis	981												
430 Turk	987												New Community Meeting Room; no residential units converted.
Holly Courts - 100 Appleton	966												
25 Sanchez	986												
42 Duboce	986												
255 Woodside	979												
491 31st Avenue	986												
345 Arguello	986												
1880 Pine	977												
Hunters Point EW	973												
Other changes during rehab													
	Change 1 BR to 2 BR	987				(1)	1						For 951 Eddy: Unit 402 changes to 2 bed.
	Change 2 BR to 3 BR	987				(2)	2						For 951 Eddy: Add closets to spare room in Unit 201 and 301; change from 2 bed

														to 3 bed.
	<i>Proposed New Total</i>				0	(7)	(6)	1	0	0	0	-12		
													TOTAL RAD SUPPORTED UNITS IN PORTFOLIO	
	Unit Count on RAD Application				72 3	20 4	28 9	15 9	40	9	1	1425		1,425
	Unit Count in CHAP				72 3	20 4	28 9	15 9	40	9	1	1425		1,425
	Actual Unit Count				72 4	20 2	28 4	15 9	40	9	1	1419		1,419
	Proposed post- RAD conversion Unit Count				72 4	19 5	27 8	16 0	40	9	1	1407		1,407

Waiting list policies have been included in the Administrative Plan of the Housing Choice Voucher Program and are included here by reference. Significant changes to the Administrative Plan are being proposed and therefore included in the public comment period.

Alice Griffith RAD Conversion:

Alice Griffith Phase I

Name of Public Housing Development: Alice Griffith Phase I	PIC Development ID: CA001000975	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) Yes, 35 RAD units will be transferred from former public housing to adjacent mixed finance new construction.
Total Units: 35 RAD units (replacement housing) 23 PBV units (replacement housing) 35 LIHTC (additional affordable housing) TOTAL: 93 units	Pre- RAD Unit Type (i.e., Family, Senior, etc.): General	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$65,980.60. \$8.7M loan funded by the Choice Neighborhoods Implementation Grant
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	*See below	23 (12 RAD and PBV units)	*See below
Two Bedroom		51 (30 RAD and PBV units)	
Three Bedroom		7 (RAD and PBV units)	
Four Bedroom		12 (RAD and PBV units)	
Five Bedroom			
Six Bedroom			

(If performing a Transfer of Assistance):	(Explain how transferring waiting list)
	Waiting list policies have been included in the Administrative Plan of the Housing Choice Voucher Program and in the Attachment R – Rental Assistance Demonstration (RAD) of the 2014 Annual Plan and included here by reference. Significant changes to the Administrative Plan are being proposed and therefore included in the public comment period.

*Alice Griffith is a five-phase project that includes LIHTC, PBV, and RAD units. The project will include 506 units total. All of the units are new construction. The total units include the replacement of the exact number and unit mix of the original 256 Low-Income Public Housing (LIPH) units at this site. Alice Griffith Phase I will include 58 of the total 256 LIPH units being replaced. Of the 58 LIPH replacement units, 35 of those are RAD. The proposed unit mix of the LIPH replacement units is included in the chart above. Although the total project includes the exact unit mix of the original LIPH units, that unit mix is not reflected in the replacement units only. The reason for that is because the housing needs of the current LIPH units are no longer appropriately served by the 256 LIPH units. Specifically, approximately eight households are possibly under-housed and 79 households are possibly over-housed when using a standard of one bedroom for the head of household and spouse/partner and one bedroom for each additional two persons, regardless of the age and gender of the occupants in the additional rooms. The table below offers more detailed information.

Over Crowding and Over Housing Unit Changes

Unit Size Increase	# of Households	Unit Size Decrease	# of Households
1 to a 2	0	2 to a 1	14
1 to a 3	0	3 to a 1	1
1 to a 4	0	3 to a 2	10
1 to a 5	0	4 to a 1	2
2 to a 3	7	4 to a 2	22
2 to a 4	0	4 to a 3	20
2 to a 5	0	5 to a 1	0
3 to a 4	1	5 to a 2	2
3 to a 5	0	5 to a 3	1
4 to a 5	0	5 to a 4	7
Total Under Housed	8	Total Over Housed	79

Therefore, the replacement housing at Alice Griffith, including RAD and PBV units, offers smaller unit sizes than the original LIPH unit mix.

The original unit mix of the LIPH housing at Alice Griffith is as follows:

1BRs – 8	4BRs – 78
2BRs – 130	5BRs – 16
3BRs – 24	Total: 256

The new Alice Griffith project will include the following total unit mix, including replacement housing mix:

Number of Units per Unit Type per Block	PHASES 1 and 2 (concurrent development)		PHASE 3 (2 LPs)	PHASE 4				PHASE 5	TOTAL
	Block 2	Block 4		Block 1	Block 8	Block 5	Block 9		
1 BDRM	23	23	13	0	0	0	0	0	132 191
2 BDRM	51	47	71	0	0	0	0	0	169
3 BDRM	7	9	35	0	0	0	0	0	51
4 BDRM	12	12	3	13	14	10	13	0	77
5 BDRM	0	0	0	5	5	0	6	0	16
TOTAL	93	91	122	18	19	10	19	132	504
Total Bedrooms	194	192	272	77	81	40	82	132	1070
Public Housing Replacement	58	58	76	18	19	10	19	0	258
Tax Credit Only Units	35	35	46	0	0	0	0	132	248
TOTAL	93	93	122	18	19	10	19	132	506

Alice Griffith Phase II

Name of Public Housing Development: Alice Griffith Phase II	PIC Development ID: CA001000975	Conversion type (i.e., PBV or PBRA): PBV	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) Yes, 34 RAD units will be transferred from former public housing to adjacent mixed finance new construction.
Total Units: 34 RAD units (replacement housing) 22 PBV units (replacement housing) 35 LIHTC (additional affordable housing) TOTAL: 91 units	Pre- RAD Unit Type (i.e., Family, Senior, etc.): General	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$64,095.44
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	*See below	23 (12 RAD and PBV units)	*See below
Two Bedroom		47 (28 RAD and PBV units)	
Three Bedroom		9 (4 RAD and PBV units)	
Four Bedroom		12 (12 RAD and PBV units)	
Five Bedroom			
Six Bedroom			

(If performing a Transfer of Assistance):	(Explain how transferring waiting list)
	Waiting list policies have been included in the Administrative Plan of the Housing Choice Voucher Program and are included here by reference. Significant changes to the Administrative Plan are being proposed and therefore included in the public comment period.

*Alice Griffith is a five-phase project that includes LIHTC, PBV, and RAD units. The project will include 506 units total. All of the units are new construction. The total units include the replacement of the exact number and unit mix of the original 256 Low-Income Public Housing (LIPH) units at this site. Alice Griffith Phase II will include 56 of the total 256 LIPH units being replaced. Of the 56 LIPH replacement units, 34 of those are RAD. The proposed unit mix of the LIPH replacement units is included in the chart above. Although the total project includes the exact unit mix of the original LIPH units, that unit mix is not reflected in the replacement units only. The reason for that is because the housing needs of the current LIPH units are no longer appropriately served by the 256 LIPH units. Specifically, approximately eight households are possibly under-housed and 79 households are possibly over-housed when using a standard of one bedroom for the head of household and spouse/partner and one bedroom for each additional two persons, regardless of the age and gender of the occupants in the additional rooms. The table below offers more detailed information.

Over Crowding and Over Housing Unit Changes

Unit Size Increase	# of Households	Unit Size Decrease	# of Households
1 to a 2	0	2 to a 1	14
1 to a 3	0	3 to a 1	1
1 to a 4	0	3 to a 2	10
1 to a 5	0	4 to a 1	2
2 to a 3	7	4 to a 2	22
2 to a 4	0	4 to a 3	20
2 to a 5	0	5 to a 1	0
3 to a 4	1	5 to a 2	2
3 to a 5	0	5 to a 3	1
4 to a 5	0	5 to a 4	7
Total Under Housed	8	Total Over Housed	79

Therefore, the replacement housing at Alice Griffith, including RAD and PBV units, offers smaller unit sizes than the original LIPH unit mix.

The original unit mix of the LIPH housing at Alice Griffith is as follows:

1BRs – 8
 2BRs – 130
 3BRs – 24
 4BRs – 78

5BRs – 16
 Total: 256

The new Alice Griffith project will include the following total unit mix, including replacement housing mix:

Number of Units per Unit Type per Block	PHASES 1 and 2 (concurrent development)		PHASE 3 (2 LPs)	PHASE 4				PHASE 5	Block 9	TOTAL
	Block 2	Block 4		Block 1	Block 8	Block 5	Block 9			
1 BDRM	23	23	13	0	0	0	0	0	132	191
2 BDRM	51	47	71	0	0	0	0	0	0	169
3 BDRM	7	9	35	0	0	0	0	0	0	51
4 BDRM	12	12	3	13	14	10	13	0	0	77
5 BDRM	0	0	0	5	5	0	6	0	0	16
TOTAL	93	91	122	18	19	10	19	132	504	
Total Bedrooms	194	192	272	77	81	40	82	132	1070	
Public Housing Replacement	58	58	76	18	19	10	19	0	258	
Tax Credit Only Units	35	35	46	0	0	0	0	132	248	
TOTAL	93	93	122	18	19	10	19	132	506	

Hunters View RAD Conversion:

Hunter's View Phase IIa

Name of Public Housing Development: Hunter's View Phase IIa	PIC Development ID: CA001000974	Conversion type (i.e., PBV or PBRA): Project Based Vouchers (PBV)	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) Yes, 54 RAD units will be transferred from former public housing to adjacent mixed finance new construction.
Total Units: 54 RAD units (replacement housing) 26 PBV units (replacement housing) 27 LIHTC (additional affordable housing) TOTAL: 107 units	Pre- RAD Unit Type (i.e., Family, Senior, etc.): General	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$101,500.02
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	*See below	30 (14 RAD)	*See below
Two Bedroom		32 (16 RAD)	
Three Bedroom		36 (19 RAD)	
Four Bedroom		8 (4 RAD)	
Five Bedroom		1 (1 RAD)	
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) Waiting list policies have been included in the Administrative Plan of the Housing Choice Voucher Program and in the Attachment R – Rental Assistance Demonstration (RAD) of the 2014 Annual Plan and included here by reference. Significant changes to the Administrative Plan are being proposed and therefore included in the public comment period.		

*Hunter's View is a multi-phase, mixed-income housing development whose affordable units include LIHTC, PBV, and RAD units. The first three phases of the project, Phases Ia, IIa, and Block 10, will include 286 units total and 214 PH replacement units. Specifically, Hunter's View Phase IIa will include 80 of the PH units being replaced. Of the 80 PH replacement units, 56 of those are RAD. The proposed unit mix of the RAD units is included in the chart above. As a whole, the replacement units will reflect smaller unit sizes than the original PH units in order to appropriately serve current PH households.

The original unit mix of the PH housing at Hunter's View is as follows:

ORIGINAL UNIT MIX	1BR	2BR	3BR	4BR	5BR	TOTAL
ALL PHASES	7	78	113	60	9	267

The unit mix of the first three phases of the redeveloped Hunter's View is as follows:

TOTAL AFFORDABLE RENTAL THROUGH BLOCK 10	1BR	2BR	3BR	4BR	5BR	TOTAL
REPLACEMENT UNITS BUILT AS OF BLOCK 10	55	59	78	19	3	214
TAX CREDIT UNITS BUILT AS OF BLOCK 10	19	22	25	6	0	72
TOTALS	74	81	103	25	3	286

Hunter's View Block 10 Component

Name of Public Housing Development: Hunter's View Block 10 Component	PIC Development ID: CA001000974	Conversion type (i.e., PBV or PBRA): Project Based Vouchers (PBV)	Transfer of Assistance: (if yes, please put the location if known, and # of units transferring) Yes, 36 RAD units will be transferred from former public housing to adjacent mixed finance new construction.
Total Units: 36 RAD units (replacement housing) 18 PBV units (replacement housing) 18 LIHTC (additional affordable housing) TOTAL: 72 units	Pre- RAD Unit Type (i.e., Family, Senior, etc.): General	Post-RAD Unit Type if different (i.e., Family, Senior, etc.) Family	Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project) \$67,668.66
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency			
One Bedroom	*See below	40 (20 RAD)	*See below
Two Bedroom			
Three Bedroom		32 (16 RAD)	
Four Bedroom			
Five Bedroom			
Six Bedroom			
(If performing a Transfer of Assistance):	(Explain how transferring waiting list) Waiting list policies have been included in the Administrative Plan of the Housing Choice Voucher Program and included here by reference. Significant changes to the Administrative Plan are being proposed and therefore included in the public comment period.		

*Hunter's View is a multi-phase, mixed-income housing development whose affordable units include LIHTC, PBV, and RAD units. The first three phases of the project, Phases Ia, IIa, and Block 10, will include 286 units total and 214 PH replacement units. Specifically, Hunter's View Block 10 will include 54 of the PH units being replaced. Of the 54 PH replacement units, 36 of those are RAD. The proposed unit mix of the RAD units is included in the chart above. As a whole, the

replacement units will reflect smaller unit sizes than the original PH units in order to appropriately serve current PH households.

The original unit mix of the PH housing at Hunter's View is as follows:

ORIGINAL UNIT MIX	1BR	2BR	3BR	4BR	5BR	TOTAL
ALL PHASES	7	78	113	60	9	267

The unit mix of the first three phases of the redeveloped Hunter's View is as follows:

TOTAL AFFORDABLE RENTAL THROUGH BLOCK 10	1BR	2BR	3BR	4BR	5BR	TOTAL
REPLACEMENT UNITS BUILT AS OF BLOCK 10	55	59	78	19	3	214
TAX CREDIT UNITS BUILT AS OF BLOCK 10	19	22	25	6	0	72
TOTALS	74	81	103	25	3	286

The remaining replacement units will be provided in the final phases of the Hunter's View project.

The Board of Commissioners also approved submission of the first set of applications for approximately 2,141 units in 22 applications. Under the RAD program, each property's current federal operating subsidy stream converts into long-term project-based Section 8 Project-Based Vouchers ("PBVs") through a 20-year Housing Assistance Payments ("HAP") contract with a mandatory 20-year contract renewal, subject to the availability of appropriations. The RAD program provides the SFHA with the opportunity to: preserve its existing housing units as affordable housing; build on the success of its HOPE VI and HOPE SF mixed-finance projects; enter into public-private partnerships with developers through a public land trust model that ensures the long term affordability and oversight of the housing through a land lease structure; provide access to new funds not available to the SFHA; and ensure improved housing conditions for residents.

HUD Action. On January 6, 2014, HUD issued a Portfolio Award Letter for SFHA's portfolio-wide application submitted to HUD on September 27, 2013 (see Attachment II). In addition, HUD provided individual Commitment to Enter into a Housing Assistance Payments Contract ("CHAP") for 21 individual SFHA projects. These projects are:

1. Holly Court
2. Bay Street
3. Hunters Point East/West
4. 990 Pacific Street
5. 1880 Pine Street
6. 255 Woodside
7. 666 Ellis Street
8. Robert B. Pitts
9. 345 Arguello Street
10. 25 Sanchez Street
11. 462 Duboce Street
12. 491 31st Avenue
13. 939-951 Eddy Street
14. 430-440 Turk Street
15. Hunters View Phase IA
16. Hunters View Phase IIA
17. Bernal Dwellings
18. Hayes Valley North
19. Hayes Valley South
20. Plaza East
21. North Beach Place

While 40 SFHA projects totaling 4,575 units in the portfolio are proposed for RAD conversion, 21 RAD applications were submitted for Year One projects, as allowed by HUD; the remaining 19 applications were submitted for Year Two projects. Of the 21 applications submitted in Year One, 7 are for existing HOPE VI or HOPE SF projects that have already converted to the public-private partnership model; see RAD projects #15-21 in the list above.

RAD Implementation Schedule. As indicated by each CHAP, San Francisco's RAD implementation schedule requires projects to convert to RAD assistance and start construction/rehabilitation within 18 months of the CHAP award. This ambitious timeline will require SFHA staff and the Board of Commissioners to focus significant SFHA resources needed to successfully meet the RAD program benchmarks.

8.0 Capital Improvements

Capital Fund Program Annual Statement/Performance and Evaluation Report.

Available for review during hearing and comment periods.

Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the *Capital Fund Program Five-Year Action Plan*, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.

Plan Describing the Capital Improvements Necessary to Ensure Long-term Physical and Social Viability of the Projects

This Narrative sets forth the SFHA's overall plan for modernization, new construction, and revitalization of public housing with highlights of the proposed 2015 Capital Fund Program (CFP) and Replacement Housing Factor (RHF) program. The SFHA has involved residents, community representatives and City agencies throughout this planning process.

8.1 Introduction

The SFHA is the largest landlord in the City of San Francisco. With over 6,200 public housing units and over 8,000 Section 8 Voucher holders it is the primary source of housing for very low-income households. Operating subsidies and modernization funds provided by the Federal government on an annual basis have not been adequate, resulting in obsolescence and deterioration at many properties. Increased federal support, innovative local financing techniques, energy conservation measures, property management and maintenance transition to Asset Management, resident involvement, and economic opportunities for residents are

critical for improving this valuable supply of affordable housing. Long-range plans are being pursued to rebuild several sites into mixed-income communities and make better use of underutilized sites and portions of sites, disposed and participate in the RAD program as described in section 7.

8.2 Identification of Physical and Management Needs

(Based on the 2007 Comprehensive Physical and Management Needs Assessments as updated in 2009 with resident and staff input):

The SFHA is continually evaluating physical and management needs for all forty-six public housing developments. The identification process started in 1990 with the hiring of two consulting firms to prepare formal physical and management needs assessments. These original Management and Physical Assessment Plans were presented in the 1991 CGP Submittal. In 1997 they were updated with the guidance and assistance of the U.S. Department of Housing and Urban Development (HUD) Intervention and Recovery Teams.

In 2002, a new, Comprehensive Physical Needs Assessment was developed with input from residents, resident organizations, and SFHA staff in an effort led by the Consultant, DLR Group. The DLR Group was hired back in 2007 to update the Needs Assessment with more current information. The review and prioritizing of the 2009 needs assessment was completed with input from the RAB in 2009 comprised of Resident leaders, Residents, and Staff members.

The SFHA's 2009 Comprehensive Physical Needs Assessment determined the immediate needs of modernization needs to be \$269 M, up \$74 M from the 2002 estimated needs of \$195 M.

Since over \$35 M in capital improvements were made during this period, the annual accrual rate of needs has been about \$15 M per year. Since the HUD funds available for modernization were a little over \$5 M per year, SFHA projected that the developments would continue to deteriorate unless significant intervention occurred with leveraged financing for rehabilitation and redevelopment of the most distressed sites. This trend has been significantly forestalled with a \$17.9 M American Reinvestment and Recovery Act grant and \$15.5 M in Capital Fund Recovery Act competitive grant funds.

In 2005 the SFHA contracted the Nelrod Company to perform a Qualified Energy Audit in accordance with the methodology presented in HUD publications "HUD Rehabilitation Energy Guidelines for Multi-Family Dwellings" (1996), "HUD Rehabilitation Energy Guidelines for One to Four Family" (Sept. 1996), and "Energy Conservation for Housing: A Workbook (1998). In an effort to improve the energy efficiency of its properties and finance energy related capital

improvements, the SFHA prepared an Energy Plan in 2007 and in 2008, selected an Energy Services Company for Energy Performance Contracting. In March 2009, Ameresco completed an Energy Audit Report that is the basis for an Energy Services Contracting program that was financed in 2010 and now has been completed.

8.3 Capital Fund Program Plans for FY 2016

The Physical Improvements planned for FY 2016 focus on completion of capital improvements in progress, urgently needed work, and mandated improvements, and energy conservation measures where cost effective:

- Urgently needed infrastructure improvements including: water main replacement; heating, plumbing, and boiler replacements; site electrical improvements; concrete restoration; roofing; waterproofing; and paving repairs.
- Interior unit upgrades including: kitchen sink and countertop replacement; range, refrigerator and cabinet replacement; asbestos, lead and mold abatement; and 504/ADA reasonable accommodations.

Modernization of senior and family developments including: elevator upgrades; hardwire carbon monoxide/smoke detector installations; fire alarm system upgrades, accessibility modifications; sidewalk repairs; exterior painting; and common space improvements.

SFHA is also pursuing cost effective opportunities for saving energy, subject to fund availability, through work items such as equipment replacement, appliance procurement, and significant renovations to units and buildings. Work also includes:

- Heating/cooling/DHW/distribution system replacements
- Replacement and upgrades to mechanical systems with high maintenance operational costs PHA- Wide
- Lighting improvements
- Showerhead, toilet, and faucet replacements
- Central laundry improvements

The Management Improvements (MI) goals include the purchasing of Energy Star Appliances, and public housing authority (SFHA-wide) computer hardware and system upgrades.

The proposed work for the 2015 CFP complements and completes tasks in progress that are part of the 2014 CFP outlined below:

- Exterior and interior stabilization of lead based paint, site improvements at family developments, and asbestos abatement at senior and family developments
- 504/ADA (Americans with Disabilities Act) accessibility modifications to apartments and

- common spaces and continuing upgrades to both senior and family developments
- Major work to be completed: boiler and hot waterline replacement; heating system improvements; waterproofing and structural repairs; window replacement; exterior painting; security gate and lighting improvements; disability modifications to apartments and common areas; range and refrigerator replacement; asbestos removal; utility line replacement; and site improvements
- Elevator repair and upgrades; fire alarm system and hardwire smoke detector installation; and at senior developments, stand by generator installations
- Vacant unit rehabilitation: vacancy reduction is one of the main focuses for the 2015 CFP and RHF. The SFHA will complete the units included in Phase III work plan and will start the Phase IV work plan. The SFHA will also conduct rehabilitation on any unit that may become vacant during this fiscal year. See Chart Below.

PIC Vacant Units as of 4/28/15 (to be provided)

8.4 Revitalization and Disposition

The SFHA has developed plans that are above and beyond the financial capacity of CFP and RHF through revitalization of the most obsolete public housing developments by leveraging public and private funding public housing, disposing of underutilized property to increase SFHA resources, and conversion to the RAD Program. These plans are consistent with the City and County of San Francisco Consolidated Plan that identifies a serious shortage of affordable housing opportunities and need to maintain a stock of housing for very low-income households. This topic is discussed in detail in Section 7.

Revitalization plans for FY 2016

Discussed in section 7

Resident hiring

For all contracts that are over a certain amount and subsidized with federal dollars, public housing residents will be hired for twenty-five percent of the workforce hours. Any contractors with the SFHA are required to provide resident hiring per these SFHA Policies and Section 3 federal MBE/WBE requirements.

8.5 Capital Fund Program Annual Statement/Performance and Evaluation Report

See Attachment IV.

8.6 Capital Fund Program Five-Year Action Plan

40 SFHA projects totaling 4,575 units in the portfolio are proposed for RAD conversion, 21 RAD applications were submitted for Year One projects, as allowed by HUD; the remaining 19 applications were submitted for Year Two projects. All applications were accepted. As this conversion progresses there will be reductions in the amount of the Capital Fund Program grants, below is a chart showing the reduction of about 6.3 million dollars in funding after Phase I and Phase II RAD conversion. The funding reduction is addressed in the CFP Five Year Plan reflected in the attachment IV to this Annual Plan.

	Number of Units Per 7/1 PIC Report	Units Requested Conversion in Phase I	Capital Fund Program	Remaining Units - End of Phase I (12/14)	Units Requested Conversion in Phase II	Capital Fund Program	Total Converted Units by end of Phase II (12/15)	Remaining Units - End of Phase II
SFHA Clusters								
967 Potrero Terrace	469	0		469	0		0	469
971 Potrero Annex	150	0		150	0		0	150
968 Sunnydale/Velasco	775	0		775	0		0	775
966 Alemany/Holly Cts	276	118	(\$212,612)	158	158	(\$284,685)	276	0
969 Westside Courts	136	0		136	136	(\$209,426)	136	0
970 Westbrook	226	0		226	226	(\$511,288)	226	0
971 Ping Yuen/Bay	285	51	(\$91,518)	234	234	(\$419,904)	285	0
973 Hunters Point	213	213	(\$431,727)	0	0		213	0
976 Ping Yuen N/990 Pacific	292	92	(\$129,523)	200	200	(\$281,572)	292	0
977 Pine/Bush	221	113	(\$101,392)	108	108	(\$122,685)	221	0
978 Rosa Parks (San Jules Apts - 8 Stand Alone)	206	0		206	198	(\$311,589)	198	8
979 Woodside	110	110	(\$102,545)	0	0		110	0
980 Mission Dolores (363 Noe - 22 Stand Alone)	114	0		114	92	(\$89,054)	92	22
982 Lundy/18th St (105 Lundy Lane - 2 Stand Alone)	109	0		109	107	(\$104,300)	107	2
981 350/666 Ellis	196	100	(\$101,091)	96	96	(\$97,047)	196	0
983 Clementina	276	0		276	276	(\$286,105)	276	0
984 California/JFK	138	0		138	138	(\$134,405)	138	0
985 Randolph/McAllister/etc (220 Randolph - 16 Stand Alone) (Great Hwy - 16 Stand Alone) (Noriega - 8 Stand Alone)	137	0		137	97	(\$128,625)	97	40
986 Sanchez/31st/Arguello	276	276	(\$286,105)	0	0		276	0
987 Turk/939/951 Eddy	149	149	(\$122,082)	0	0		149	0
988 Robert B. Pitts	203	203	(\$392,055)	0	0		203	0
Subtotal	4,957	1,425	(\$1,970,650)	3,532	2,066	(\$2,980,685)	3,491	1,466
HOPE SF Projects								
974 Hunters View 2	119	54	(\$2,162)	65	39		93	26
975 Alice Griffith	256	0		256	190	(\$429,099)	190	66
989 Hunters View 1	54	54		0	0		54	0
Subtotal	429	108	(\$2,162)	321	229	(\$429,099)	337	92
HOPE VI Projects								
960 Hayes Valley North	51	51	(\$53,492)	0	0		51	0
961 Hayes Valley South	66	66	(\$64,364)	0	0		66	0
962 Bernal Dwellings	160	160	(\$162,837)	0	0		160	0
963 Plaza East	193	193	(\$194,723)	0	0		193	0
990 North Beach	138	138	(\$134,554)	0	0		138	0
991 Valencia Gardens	148	0	(\$149,753)	148	148	(\$149,753)	148	0
Subtotal	756	608	(\$759,723)	148	148	(\$149,753)	756	0
Grand Total	6,142	2,141	(\$2,732,535)	4,001	2,443	(\$3,559,537)	4,584	1,558

Total CFP reduction at the end of Phase I
(\$2,732,535)

Total CFP reduction at the end of Phase II
(\$3,559,537)

8.7 Capital Fund Financing Program (CFFP).

Not Applicable

Modernization and Management Improvement

Mandatory Physical & Management Improvements

- Lead Based Paint (LBP) abatement or in-place management activities.
- Asbestos Containing Material (ACM) abatement activities.
- Mold and Moisture abatement.
- Modification of apartments and common areas for use by disabled to comply with ADA and/or 504 requirements.
- Emergency improvements for life safety problems, and property stabilization by addressing leaking roofs and waterproofing building's exterior.
- Management improvement activities required by legal settlement, HUD audit finding, or identified by HUD's PHAS.
- Completion of Comprehensive modernization activities funded through CFP

Urgent Physical & Management Improvements

- a) Emergency improvements such as chronic malfunctioning elevators, correction of hazardous conditions, etc.
- b) Identification and proper abatement of potentially toxic materials and unhealthy conditions. Specific activities would include testing and abatement of asbestos, lead, chronic mildew, etc. Repair/replacement/installation of ventilation systems.
- c) Improvements that will enhance the security of residents. Such activities would include installation of vandal resistant security lighting, security grills, surveillance equipment, gates, etc.

Serious Physical & Management Improvements

- Major repairs to heating, plumbing, sewer, electrical systems, etc.
- Physical improvements to non-dwelling space for the expansion or improvement of resident activities and services and SFHA management operations.
- Improvements to SFHA management operations to improve efficiency and the delivery of services to residents.

Coordinated Activities to Ensure Efficiency

When work items are to be completed at different times at one particular development, activities are sequenced to maximize efficiency. Building exteriors are not repainted until lead-based paint testing has been completed, for example. No completed work should have to be disturbed to address a subsequent non-emergency work item. This strategy may vary according to the condition of the building.

When special mobilization is required to address an item that is needed at several developments, the inclusion of all of these developments into a single effort will be considered.

Maintenance and management issues brought up at the RAB meetings and citywide public hearings shall be referred to the appropriate departments, including Maintenance and Management.

Remaining Physical, Management, and Other Needs

Remaining physical and management improvements are those that are addressed based on the severity of the problem, the efficiency of addressing the problem along with other more urgent items or on the cost savings that will result from completing the improvement.

- Management Issues - timely street cleaning, tree pruning, sidewalk repair, anti-vandalism strategies, appropriate trash collection system, proper cleaning of site, on-site security, site resident monitors, neighborhood programs to monitor loitering, recycling programs for each site, TA offices for the senior developments, and graffiti abatement, among others.
- Maintenance Issues- clean-up of playground facilities, better maintenance programs for elevators and boilers, availability of maintenance workers who live in the city during emergency calls, intercom systems for all the senior developments, new furnishings for public areas when needed, well maintained doors and windows, proper graffiti abatement, addition of weather stripping on all doors, addition of handrails to dangerous areas/ areas with seniors, add landscape irrigation system, timely maintenance response, kitchen cabinet repair, wall heater replacement, general unit improvements and need for new appliances, among others.

Addressing Developments with Higher Needs

Where many serious improvements are needed and the repair, replacement or redesign of major building elements will require the temporary relocation of families to allow for the work to proceed, a comprehensive rehabilitation approach was developed. All-important physical problems will be addressed at that time, funding permitting to maximize the efficiency and long-range success, and to reduce overall cost associated with such efforts. When family relocation is not required and improvements can be completed without major disruptions, funding permitting, a sequenced rehabilitation approach will be followed.

The SFHA established an agency goal of pursuing every opportunity available to replace obsolete public housing units in San Francisco. The strategies propose the use of available public and private funding, creating alternative ways to rebuild public housing into mixed income communities and dispose of underutilized property to increase SFHA resources. They are consistent with the City and County of San Francisco Consolidated Plan that identifies a serious shortage of affordable housing opportunities and need to maintain a stock of housing for very low-income households.

The SFHA is now implementing some of these more detailed strategies with developer partners, City agencies, residents, and community groups. Site-specific community advisory teams composed of residents and the surrounding communities are being engaged in the pre-development process with already selected and engaged development teams. These Strategies are discussed under Chapter 7.

9.0 Housing Needs

9.1 Strategy for Addressing Housing Needs. Provide a brief description of the SFHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.**

The SFHA is confident that by continuing to meet its goals and objectives as set out in this Five Year Plan, working with the local community advocates, and City departments, the housing needs of families will improve.

10.0 Additional Information: Describe the following, as well as any additional information HUD has requested.

(a) Progress in Meeting Mission and Goals.

The SFHA has made progress in meeting its Five-Year Plan goals. **See section 5.2.**

(b) Significant Amendment and Substantial Deviation/Modification.

A significant amendment and substantial deviation/modification to the Annual Plan is any change in policy which significantly and substantially alters the SFHA's stated mission and the persons the Agency serves. An exception to this definition will be made for any changes

As mandated by the U.S. Department of Housing and Urban Development, the SFHA must define what a substantial change to the Agency Plan is. If a proposed change to the Agency Plan is considered a substantial change it must undergo a public process that includes: consultation with the Resident Advisory Board, a public comment period, public notification of where and how the proposed change can be reviewed, and approval by the SFHA. Therefore, the SFHA defines significant changes to the Agency Plan to be:

- Changes to tenant/resident admissions policies;
- Changes to the HCV termination policy;
- Changes to the tenant/resident screening policy;
- Changes to public housing rent policies;
- Changes to the organization of the waiting list;
- Change in the use of replacement reserve funds under the Capital Fund;
- Change in regard to demolition, disposition, designation or conversion activities.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; such changes will not be considered significant amendments by HUD.

(c) Performance Improvement

SFHA is currently under a Recovery Agreement and Plan that was executed on September 4, 2013. The Action Plan addresses items related to Governance and Finance.

10.0 Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. **Note:** Faxed copies of these documents will not be accepted by the Field Office.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations* (which includes all certifications relating to Civil Rights)
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only)
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only)
- (d) Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only)
- (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
- (g) Challenged Elements
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report* (PHAs receiving CFP grants only)
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only)

Required Submission for HUD Field Office Review.

Required Supplemental Documents : See Attachment VI

Challenged Elements – NO CHALLENGED ELEMENTS

11.0 Required Submissions for HUD Field Office Review

- a. Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations
- b. Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only)
- c. Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)
- d. Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)
- e. Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only)
- f. Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
- g. Challenged Elements — **No Challenged Elements**
- h. Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report*(PHAs receiving CFP grants only)
- i. Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only)

The SFHA has complied with all regulatory submission requirements prior to the submission deadline.