

MTW Supplement Starting July 1, 2022

ATTACHMENT A PUBLIC, TENANT ASSOCIATION, and RESIDENT ADVISORY BOARD COMMENTS

E-mail comment #1 Received December 2, 2022:

“Hello my name is [REDACTED] and I’m interested in the MTW program I’m seeking for better housing and living conditions for me and my 8 year old kid.”

E-mail comment #2 Received December 2, 2022:

“My name is [REDACTED], a resident of [REDACTED]. This morning I received your notice as regards AHA's and MTW's initiative, which is to "[provide] [opportunities] to design and implement innovative, local strategies that increase housing choices for low-income families.”

My comment proves simple if yet concise. First off, allow me to share this. I was born and reared in [REDACTED]. Second, I am a U.S. Air Force veteran, who in the autumn of 2004 required setting aside all my immediate planning so as to resolve a family emergency, which arose in Washington, D.C. For 3 years following I was the sole caretaker for a family member. Once this, say, mission proved fulfilled, I then returned to Alameda. This entire event did take its toll, however. Would that I had someone to later come and take care of me.

Expressions and consequences of all manner subsequently accreted, ay, on that of finance, health, and of course, my overall quality of life. Yet, do I regret having made this sacrifice? -- oh, no. Indeed, had I not proceeded, my only regret would have been that I did not do so in the first place. Nevertheless, the effects of this all proved consequential. One inexorable effect has been that of garnering a sensical place to live; this, given my now-financial condition from all that I required sacrificing: some losses shall never be recovered.

In the immediate years that followed my return to California, my circumstances cascaded and then collapsed, living 13 months in a homeless shelter followed by 2.5 years in housing dedicated to U.S. military veterans. So, you may well see, I have little use for choir boys and veritably useless theorists and policymakers.

This all notwithstanding, I write specifically to that of the housing dilemma faced by not only myself but as well an untold number of citizens residing in the city and county of Alameda if not the entire nation.

It is this. That there exists pronounced shortages of well-appointed housing evidence to me that housing benefactors, facilitators, and administrators alike need considerably-so to speedily master the art of improvising for sake of those citizens who were bred and reared in humble beginnings and who had to learn this art, -- strike that -- the science of living at precious young ages. Indeed, regardless of whether one is of well-heeled beginning or from a gnarly ghetto, rest assured that anyone who has served in the armed forces knows to endeavor to use what one has rather than carry-on cluelessly like a skulking choir boy.

1) Given that there proves no- or too-little housing, then use what exists already, use what you have.

2) To that end, administer a collaboration initiative with property managers and owners and landlords alike to whom they are already renting housing; and then append their leases to include the Section-8 or likewise subsidy:

a) To wit: I rent from a company that is not at all averse to leasing apartments or rooms to subsidy-eligible tenants. Afford them and such tenants the opportunity of a subsidy now rather than have these tenants hole-up somewhere in earth's ether, waiting for a blessing and release from Capitol Hill.

b) When broaching this idea to and inquiring on it with the AHA, the notion appeared to the then-staff to be novel at best if not outright untenable and naive.

-- But ...1st off, here, you have a tenant in need

-- 2nd, you have a facility in which to reside them

-- 3rd, you have the wherewithal to facilitate the residency at once.

b) Why alone dare to focus all energy, money, and effort on building new edifices?

-- See what tenants and what managers there are who prove amenable to improvising, to accord a shifting away from conventional ways of resolving shortages; instead. segueing to a whole new way of proceeding with the city's housing dilemma.

Mirabile dictu, I find that very, if not most often policy makers serving in the U.S. Congress and those in HUD have little if any exposure to these types of life challenges - they have very little if any experience to the dimensions involved, moreover, no idea or concern about learning the questions to ask, much less the daring; to wit:

Almost no public officials are renters | AHO News (affordablehousingonline.com).

I should hope that the AHA, FTW, and HUD make themselves useful.”

E-mail comment #3 Received December 5, 2022:

“On behalf of Island City Development (ICD), we welcome and support the proposed MTW Supplement to the Annual Plan by implementing alternative reexamination, inspection schedule, and revising some of the Project-Based Voucher program requirements.

Particularly, ICD strongly supports the following activities: 2022-08 (Increase PBV Cap), 2022-09 (Increase PBV Project Cap), 2022-10 (Elimination of PBV Selection for PHA-owned Projects), and 2022-13 (Allow Owner Referrals Under Project-Based Voucher Program).

For activity 2022-09, we find it helpful to go above the existing project cap up to 100% of the units at a project.

For activity 2022-10, would the agency consider revising the applicability from “to units owned by a single-asset entity of the PHA” to “to units owned by a single-asset entity of the PHA and/or where the PHA’s nonprofit development arm or single-asset entity is the managing general partner to the limited partnership”? This would allow PHA owned properties to utilize low-income housing tax credits where the owner is often a limited partnership with the nonprofit developer/PHA’s nonprofit development entity being the managing general partner.

For activity 2022-13, it appears that this applies to “only a subset of assisted households” and applies to “all family types”. We want to thank you for the flexibility of all family types. We expect this MTW activity will help streamline lease up efforts on new construction projects, especially permanent supportive housing projects. Would projects serving homeless or formerly homeless households be considered within the “subset of assisted households”? We find it helpful to have this activity apply to all properties with project-based vouchers, as these projects are often tax credit projects and need to fill units expediently. It appears full implementation would be delayed until AHA exhausted its wait lists before allowing owners to refer. What is the anticipated timeline for owners to be able to start utilizing this MTW activity? It would be helpful to allow projects utilizing CES to take advantage of this MTW activity concurrently. Island City Development in cooperation with its service providers Alameda Point Collaborative and Building Futures, strongly urges these streamlined efforts to fill units that will serve targeted populations with supportive service needs.

Again, thank you for the opportunity to provide our comments. We appreciate the Housing Authority of the City of Alameda’s support and commitment to implementing creative solutions to help solve the housing crisis in the City of Alameda and the greater Bay Area region.”

E-mail comment #4 Received December 6, 2022:

“What would the process be like to apply for this program? Do you already have to be on some kind of housing list with Alameda county? Can single people apply? I believe I

am signed up for this program with [REDACTED] and currently on the waitlist for a few places. However, I am in [REDACTED] and interested in the MTW program. As a survivor fleeing from human trafficking and a high risk homeless youth I would really appreciate and fully support the MTW program coming to Alameda county and will be interested in hearing more about when this officially processed and if I can benefit from this. However, I know many will.”

E-mail comment #5 Received December 6, 2022:

“Hi I have Questions about the email that was sent to me I’ll be present by not sure what it’s for and I’m not sure what I’m supposed to do”

E-mail comment #6 Received December 6, 2022:

“My name is [REDACTED], I'm interested in this program . My phone number is [REDACTED]. My email is [REDACTED]”

E-mail comment #7 Received December 6, 2022:

“Good morning,

I made the zoom meeting today. There was not enough information given about the mtw. Are we doing this to get more AHA properties or bring more landlords in? I woke this morning to an email about this meeting looked at the agenda and went to a 38 page detailing of what the meeting was about. Did I miss the email about the meeting on the 5th?

I feel that I wasn't given enough to to read about this to form any questions concerning the MTW. If I read your email correctly then I have until this evening to respond.

Let's be fair in getting the information out to us in advance with enough to go through all these pages so we can come questions and get understanding about what going on in AHA.

Now we have this meeting on the eight that you are requesting questions and comments on this program be turned in today. I need a little more clarity on how this affects me and my voucher. How it affects how the work gets done there.

As of today I have been waiting 3 months for recertification to get done.

Thank you for your time”

E-mail comment #8 Received December 8, 2022:

“Thank you for the opportunity to provide Public Comment on the Alameda Housing Authority’s Moving To Work Supplement.

I am emailing these comments on behalf of the Alameda Point Collaborative (APC) APC is a permanent supportive housing program serving formerly homeless families at Alameda Point. We hold a number of PBV’s and they have been a huge asset in helping our residents overcome homelessness. We believe the proposed changes in the MTW Supplement will provide significant improvements.

APC supports the Supplement in general but would like specifically call out activities 2022-9, and 2022-13 for the impact these activities could have on helping to end homelessness.

For 2022-9, we support going above the project caps, particularly in projects that are required by regulation to serve a high percentage (and in some cases 100%) homeless. Current project caps make it challenging for the projects to be financial viable.

For 2022-13 we support the proposed language as it will help streamline lease up of new projects. However we would like this section to go further and explicitly allow the utilization of CES as a referral for PSH projects, as well as including language to conform with the tenant selection regulations of the California Tax Credit Allocation and State of California Housing and Community Development, including the local preference allowances included in the HCD multi-family regulations.

Lastly, we recommend that if no referral is achieved within 30 days that the sponsor is able to offer other eligible referrals from sources outside CES. There is both a moral and financial imperative to fill units for our unhoused neighbors as quickly as possible and we need the flexibility to achieve this if the primary referral system proves unable to provide referrals within 30 days during both lease up and ongoing operations.

Thank you for considering our suggestions.”

E-mail comment #9 Received December 8, 2022:

“Thank you for the opportunity to provide Public Comment on the Alameda Housing Authority’s Moving To Work Supplement.

I am emailing on behalf of Building Futures. Building Futures was founded in 1988 to provide care, resources, programs, and services to help Alameda County residents build futures free from homelessness and family violence. Building Futures services are housing first, trauma-informed, and harm-reduction based. Services include emergency shelters, permanent housing, a 24-hour crisis line, a domestic violence outreach program providing support groups, and individual support and resources. BFWC’s Housing Resource Center provides case management and housing assistance to help individuals and families avert homelessness and become quickly rehoused after becoming homeless.

Building Futures operates an emergency shelter for families and permanent supportive housing in the City of Alameda and is an integral part of providing services and housing to our unsheltered neighbors in Alameda.

Building Futures supports the Supplement in general and would like to elevate the importance of “Activity 2022-13: Allow Owner Referrals under Project Based Voucher Programs”.

In addition to supporting the current language we also recommend that the policy is structured to conform with California Tax Credit Allocation and State of California Housing and Community Development regulations.

Further, we recommend that if no referral is achieved within 30 days that the sponsor is able to offer other eligible referrals from sources outside CES. There is both a moral and financial imperative to fill units for our unhoused neighbors as quickly as possible and we need the flexibility to achieve this if the primary referral system proves unable to provide referrals within 30 days during both lease up and ongoing operations.”

E-mail comment #10 Received December 8, 2022:

“Thank you for the opportunity to provide. Public Comment on the Alameda Housing Authority’s Moving To Work Supplement.

I am emailing on behalf off Operation Dignity. Operation Dignity was founded in 1993 to provide transitional and emergency supportive housing to homeless veterans in Alameda County to help them create a future free from homelessness. Operation Dignity’s services are housing first, trauma-informed and harm-reduction based. Our case managers work with veterans to build self-sufficiency goals, connect to services, and secure permanent supportive housing.

Operation Dignity also provides permanent supportive housing for unhoused individuals, and will have additional units for this purpose under the RESHAP plan of which we are a partner.

Operation Dignity supports the Supplement in general and would like to elevate the importance of “Activity 2022-13: Allow Owner Referrals under Project Based Voucher Programs”.

In addition to supporting the current language we also recommend that the policy is structured to conform with California Tax Credit Allocation and State of California Housing and Community Development regulations.

Further, we recommend that if no referral is achieved within 30 days that the sponsor is able to offer other eligible referrals from sources outside CES. There is both a moral and financial imperative to fill units for our unhoused neighbors as quickly as possible

and we need the flexibility to achieve this if the primary referral system proves unable to provide referrals within 30 days during both lease up and ongoing operations.”

E-mail comment #11 Received December 8, 2022:

“We are writing to comment on the Housing Authority of the City of Alameda's (AHA) MTW Supplement for the Fiscal Year beginning July 1, 2022 (MTW Supplement).

We have concerns about portions of the following sections of the MTW Supplement:

3.b. Alternative Reexamination Schedule for Households

Consistent with the other components of this proposal to reduce annual and interim recertifications, this section of the MTW Supplement proposes to reduce the frequency of and circumstances triggering interims for decreased income of participant families. We are concerned that this proposal will result in financial burdens upon families that are not sufficiently mitigated by the hardship policy.

To be eligible for an interim that results in a decrease in the family portion, "the family must show that the gross income loss is going to significantly (greater than 10%) and long-term (more than 6 months) change the family's annual income going forward from the income used at the last income calculation.”

However, a loss in income of even less than 10% can have a significant negative impact on the most marginalized families; likewise, a loss of 10% income over a period of far fewer than 6 months may also result in significant financial hardship. Either of these circumstances may limit the ability of families to pay for rent or other basic necessities.

The hardship policy appears to apply where families require a second interim for decreased income, rather than to allow for consideration of hardship where a family requires a first interim decrease that does not meet the 10%/6-month threshold.

We would ask that AHA reduce the triggering income decrease and time period for a family to be eligible for an interim for decreased income or accept a family's self-certification that it is unable to pay their rent or basic necessities in order to trigger eligibility for requesting a first *or* second decrease through the hardship process.

In addition, we are concerned the MTW Supplement states that "if the family is facing eviction due to not being able to pay rent after an income loss, the family can still request a decrease through the Hardship process.” The eviction (unlawful detainer) process is a fast-paced summary proceeding that is very difficult for families to navigate in a timely fashion. Requiring that families be faced with eviction before they can request a decrease through the hardship process inherently introduces significant risk of homelessness and places a significant burden on families. Therefore, we would ask that AHA instead accept family self-certification that they are unable to pay their rent or

basic necessities in order to trigger eligibility for requesting a first or second decrease through the hardship process, rather than require them to be facing eviction.

4.a. Vacancy Loss; and 4.b. Other Landlord Incentives

We appreciate the need to incentivize landlord participation to broaden housing opportunities for program participants. We would like to recommend that AHA incorporate guidelines or criteria into the landlord participation program to ensure that landlords who have vacancies as a result of prior violation of tenant's rights are not awarded incentive payments. For example, where a landlord has had a prior HAP contract abated or cancelled or has had other citations for substandard conditions at the property, incentive payments should not be awarded.

We would welcome the opportunity to discuss our comments further as the revision process unfolds. We thank you for your time and consideration.”

Paraphrased questions and comments from Resident Advisory Board December 8, 2022:

Comment relating to 2022-01 2.b. Payment Standards:

1. Who do you need special permission from?
2. Do you think HUD will approve the activity?

Comment relating to 2022-02 3.b. Annual Reexamination Schedule:

1. They are a more at risk group.
2. Is this only for family that goes to work?
3. For example, I'm retired already and not working anymore do I participate in this program?

Comment relating to 2022-10 9.c. Elimination of PBV Selection Process for PHA-owned Projects without Improvement, Development, or Replacement:

1. So that affects the waitlist?

Comment relating to 2022-13 Allow Owner Referrals Under PBV Program:

1. So you are putting an extra burden on the owners?
2. Owner are not balking at it, but what is the benefit?

Comment relating to 2022-14 Project-Based Voucher Right Sizing:

1. What is the standard for overcrowding

2. It is a lot to take in, can see the potential with the immigration issues and people trying to bring in more individuals into their households

General Comments:

1. I am only by myself and I am retired and I don't want to approve of program, when does this program start?
2. So I have to fill in the forms in the future?
3. Comments specific to a complex and not relating to the MTW plan were not included here.