

Housing Choice Voucher Admin Plan: Proposed Changes for 2017-2018

Page	Section	Change
2	Rules and Regulations	Added “HRHA updates the AP as needed. Substantive changes to the AP require approval of HRHA’s Board of Commissioners. Technical and clarification changes do not need Board approval.”
3	HCVP Roles and Responsibilities	Updated list of positions; plan to clarify duties
7	Reasonable Accommodations	Clarified how requests are made and how disability and the need for accommodation are verified as part of the approval process. Specified a new form and extra questions for medical verification, if a live-in aide and/or extra bedroom is requested.
12	Services for Non-English Speaking Applicants and Participants	Previously stated that Spanish would be accommodated. Changed to reflect actual practice: “As needed, HRHA will utilize a translation service to assist with meetings and phone calls to serve families in their requested language.”
13	Quality Control	Previously said the sample size would be the greater of the HUD minimum or 5 percent; changed to say that HRHA will use the HUD minimum sample size.
14	Definition of Family	Added verbiage about joint custody: “Children who are subject to a joint custody agreement will be included if they are in the household at least 51% of the time. HRHA will follow directives outlined in court orders when available. Children who are in the household less than 50% of the time will not be included on the voucher, but will be exempt from the visitor policy so long as the household submits a written request to both HRHA and the landlord”
15	Family With or Without Children	Added clarification: “When families consisting of two families living together, (such as a mother and father, and a daughter with her own husband or children), apply together as a family, they will be treated as a one-family unit. HRHA does not permit the addition of a family to an existing voucher-assisted household; see the Change in Family Composition section”
15	Single Person Family	Clarified verbiage – refers to families not already defined in other categories (elderly, disabled, etc.)
16	Live-In Aide	Specified that “Any live-in aide must be able, upon request, to submit supporting documentation to verify that they meet the above definition, including proof and/or certification of separate finances, and documentation that the aide has or has left a prior residence in good standing (i.e., they are not being added to the household due to their own need).” Added that verification of a live-in aide will ask the medical

Page	Section	Change
		professional about the duration; hours & level of care; and skill level/training/qualifications needed.
16	Income Limitations	Previously said households could not exceed 30% of area median income (AMI). Now says that households cannot exceed 50% AMI, and that 75% of new admissions must be under 30% AMI. Continuously assisted can go up to 80% AMI.
18	Citizenship	Added citizenship eligibility information that was previously in the verifications section.
19	Other Criteria for Admission	Added that being an officer/employee of HRHA who influences policy decisions renders an applicant ineligible. Added student ineligibility specifics based on regulations.
19	Drug-Related and Other Criminal Activity	Separated into its own section and rephrased / reorganized for clarity (no change to rules, though some regulatory requirements that were not listed previously were added to the text).
20	Applicant and New Member Screening	Added that HRHA performs a background check on all adults age 18 and over prior to admission and new members being added. Added header to “suitability of tenants” section to emphasize it (no change in policy).
21	Waiting List Administration	Changed section title (previously called “Applying for Admission”) and added to introduction paragraph to describe contents. Moved “Application Lifecycle” section into the next section, now titled “Admission Process” (previously “Selection of Applicants from the Waiting List”). Moved “Special Provisions for the Use of Targeted Vouchers,” “Preferences,” and “Waiting List Procedures” into this section.
23	Weights & Rankings for Waiting List Preferences	Changed working preference to apply not only to low-earners; clarified that it applies to those who earn income based on inability to work. <u>Current:</u> Working Poor - Employed applicants are employed at least 20 hours per week and earn less than thirty percent (30%) of the median income of HRHA’s jurisdiction. <u>Revised:</u> Working - Employed applicants are employed at least 20 hours per week or are receiving income based on their inability to work.
24	Weights & Rankings for Waiting List Preferences	Previously stated the local preference was for applicants that “live and work” in the jurisdiction; changed to live “and/or” work.
24	Weights & Rankings for Waiting List Preferences	Added verbiage to veteran preference to clarify that it applies to the spouse, co-head, or surviving spouse, as well as the head of household.
29	Voucher Issuance	Took information on voucher term and voucher extensions that was previously in the “Issuing or denying

Page	Section	Change
		vouchers” section and created a new section. Added info on tolling time and briefing new families, to match regs & practice.
29	Voucher Extensions	Changed length of extensions HRHA will grant from “up to 90 days or less” to “one or more 60-day extensions.” Clarified use of Extension Request form & changed requirement to include a statement of efforts in searching from mandatory to discretionary upon HRHA request.
31	Exceptions	Expanded to clarify medical/disability reasons for exceptions, pointing to the Reasonable Accommodations chapter and adding that “Extra bedrooms are generally not considered for intermittent overnight assistance.”
32	Flexibility of Unit Size Actually Selected	Gave this information its own header.
32	UA Schedules	Added general information & added paragraph about higher UA schedule rates as accommodation
33	Payment Standards	Changes had been approved last year but did not get into final AP: <u>Current:</u> HRHA adopts a standard of 100% of the published FMR, for all bedroom sizes except for 2-bedroom homes . Within HRHA’s jurisdiction, housing availability justifies a PS for 2-bedroom homes of 110% of the FMR <u>Revised:</u> HRHA adopts a standard of 110% of the published FMR, for all bedroom sizes . HRHA may approve an exception payment standard of up to 120% as part of an approved reasonable accommodation request, when applicable
36	Annual Income (Inclusions)	Added reg. update on student financial assistance
36	Annual Income (Exclusions)	Added “Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member”
38	Earned Income Disregard	Moved from “Interims” section to here
40	Minimum Rent	Changed from \$75 to \$50 Moved from its own section into this section.
41	Zero-Income Households	Specified that zero-income households may need to certify status up to once per quarter
41	Verification	Complete overhaul of methods & hierarchy to reflect current HUD EIV requirements
46	Verification of Allowable Deductions	Added “HRHA will rely on HUD Handbook 4350.3, Exhibit 5-3, Examples of Medical Expenses That Are Deductible and Nondeductible, to determine which items to allow as a medical expense. If HUD guidance is not clear, HRHA will rely on IRS Publication 502”
47	Verification of Non-Financial Factors	Combined verification list & requirements for age, identification, birth

Page	Section	Change
52	Verification of Waiting List Preferences	Updated to add clarity and details; moved some verbiage from the waiting list chapter to here.
53	Requests for Tenancy and the Contracting Process	New section to reflect regs and current practices. Includes several separate previous sections (denying owner participation; rent reasonableness; special housing types); no change in practice/policy.
55	Rent Reasonableness	Reg. update as to when RR is required for FMR decrease: If 60 days before the contract anniversary date there is a 10% decrease in the published FMR as compared to the previous FMR (previously 5%)
56	Rent Affordability	New section to explain renting above payment standard up to 40% income
56	Types of Inspections	Biennial – added verbiage “Units not subject to an annual inspection will have a biennial inspection performed.”
62	Continued Occupancy	New Chapter – contains info that was previously scattered (absence policy; visitor policy; voucher status in case of family dissolution; remaining member of tenant family; changes in household composition).
62	Absence of Sole Member or Entire Family	Added clarification that shorter absences are sometimes considered unauthorized.
63	(same)	Added methods by which HRHA may determine an absence
63	Absence of Any Family Member	<ul style="list-style-type: none"> ○ <u>Added Current Practice to AP – Verifying Unreported Absence:</u> Listed ways HRHA may attempt to verify a family’s unreported absence from a unit (i.e., calling, asking neighbors, verifying utilities, inspection, sending letters)
63	Types of Absences	<ul style="list-style-type: none"> ○ <u>Added Current Practice to AP - Hospitalization:</u> For medical absences, HRHA will try to obtain information to determine the likelihood and timing of the person’s return ○ <u>Added Current Practice to AP – Foster Care:</u> For children in foster care, HRHA will try to obtain information to determine how long kids will be away; may reduce voucher size temporarily if greater than 180 days (will remove from voucher if permanently removed) ○ <u>New Policy - Incarceration:</u> If any family member is incarcerated for drug-related or violent criminal activity, HRHA will pursue termination of assistance as appropriate. Incarceration for any other reason that is allowable by program standards may be allowed if the absence request is submitted as required, and the family continues to pay their portion of the rent, up to 180 days.

Page	Section	Change
		<ul style="list-style-type: none"> ○ <u>New Policy - Absence of Parent(s)</u>: If no parent remains in a household that includes minor children, and the appropriate agency has determined that another adult is to be brought into the assisted unit to care for the children for an indefinite period, HRHA will immediately add the new caretaker to the household composition while eligibility is reviewed, including criminal background checks. If the caretaker does not pass any portion of HRHA’s eligibility screening, including the criminal background check, the caretaker will be removed from the voucher. If no other caretaker is identified and the ineligible individual remains the caretaker for the children, assistance will be terminated. When HRHA approves a person to reside in the unit as caretaker for the children, this person’s income will be counted in the TTP for the family pending a final disposition. HRHA will work with the appropriate service agencies and the owner to provide a smooth transition in these cases. ○ <u>Added Current Practice to AP - Court-Ordered Absence</u>: If a member of the household is subject to a court order that restricts him/her from the home for more than 180 calendar days, the person will be considered permanently absent. ○ <u>Added Current Practice to AP - Military</u>: If an adult child goes into the military and leaves the household, they will be considered permanently absent.
65	Voucher Status in Case of a Family Dissolution	Added new verbiage to specify what factors HRHA may consider
66	Changes in Family Composition	<p>Clarified who can be added to the household</p> <p>Families must report and provide documentation of household composition changes within ten business days: (1) When any person leaves the unit; (2) The birth, adoption, or court-awarded custody of a child. No other person may be added to the household without prior HRHA approval. Allowable additions, if the family’s written request complies with HRHA requirements and the individual is eligible (including background screening and owner approval), include: Approved live-in aides; Foster child/adult; Additions by marriage, civil union, or domestic partnership; Adult children between the ages of 18 and 21 who are full-time students; Addition of a parent, age 62 or older and/or disabled, who needs disability-related care</p>
66	Annual Recertifications	Added section to reflect practice; no change in policy

Page	Section	Change
67	(same)	Added: “HRHA may schedule its recertification prior to the family’s anniversary date for administrative purposes; if doing so, HRHA will ensure a 30-day notice”
67	Streamlined Income Determination	New section to detail new policy/practice authorized by HOTMA - for any family member with a “fixed source of income” to use a verified cost of living adjustment, rather than a full verification of the person’s income, from the prior year’s income, and only doing a full certification of their income every 3 years.
69	Effective Dates for Interim Recertifications	<p><u>Current:</u> Requests must be received by the 25th for the change to be reflected in the following month.</p> <p><u>Revised:</u> If information, including all required verification, is received in a timely manner (i.e., within 10 days of the change), the certification will be effective as follows:</p> <ul style="list-style-type: none"> ○ For decreases to be reflected in the following month, documentation of the change and all required verification must be submitted to HRHA by the 15th of the prior month. ○ For changes that cause an increase in tenant rent, the family will receive at least 30 days’ notice if the change and all required verification is submitted in the required timeframes. ○ If the family fails to provide required information in a timely manner, they waive their right to a 30-day notice prior to an increase in their portion of the rent. Decreases in rent portion will not be retroactive.
69	Family Moves and Portability	Reorganized information
70	Notice of Requirement to Move	Clarified that the owner must sign the tenant’s notice that the tenant provides to HRHA.
76	Denial or Termination of Assistance	Separated into its own section
78	Guidelines for Payment Agreements	<p><u>Current:</u> That the agreement is in default when a payment is delinquent by one month</p> <p><u>Revised:</u> That the agreement is in default when a payment is not made by the due date</p>
	No Smoking Policy	Removed (not applicable to HCVP)