

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2019
EFFECTIVE DATE 10-1-18 TO 9-30-19**

HIGHLIGHTS:

Throughout:

- Name Change
- HUD Form number Updates
- VAWA Updates
- Other minor regulatory changes
- Minor changes to increase clarity of existing policies

Chapter 3: Eligibility

- Change requirement for inclusion in family from 51% custody or greater to 50% custody or greater
- Added option for additional background checks

Chapter 7: Verification

- Assets totaling \$5,000 or less to be reviewed every three years rather than annually

Chapter 15: Special Housing Types

- Addition of Single Room Occupancy & Shared Housing as Special Housing Programs

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-18**

Section	Previous Policy	Proposed Policy	Required Change	Impact
Throughout	HACSA	Homes for Good	No	Agency rebranding process
1-I.D.	<p>The PHA’s administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition, the administrative plan addresses policies for the following special programs:</p> <ul style="list-style-type: none"> • Family Self Sufficiency • Single room occupancy (SRO) • Homeownership • Veterans Affairs Supportive Housing (VASH) 	<p>The PHA’s administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition, the administrative plan addresses policies for the following special programs:</p> <ul style="list-style-type: none"> • Project Based Voucher (PBV) & Rental Assistance Demonstration Project Based Voucher (RAD PBV) • Family Self Sufficiency • Single room occupancy (SRO) • Homeownership • Veterans Affairs Supportive Housing (VASH) 	No	Added Clarity
1-II.D.	N/A	24 CFR Part 100: The Fair Housing Act	Yes	HUD Regulation
2-I.A.	<p>State protected classes in addition to already federal protected classes, and in addition to those protections offered under the Equal Access in Housing Final Rule include:</p> <ul style="list-style-type: none"> • Sex (includes pregnancy) • Retaliation for opposing an unlawful employment practice • Association with a member of a protected class • Age (18 or older) • Family relationship <p>State discrimination law also prohibits a person from refusing to sell, lease, or rent any real property because of an individual’s source of income.</p>	<p>In addition to Federal law, the State of Oregon recognizes Sexual orientation, marital status, and source of income as additional protected classes. Furthermore City of Eugene adds Ethnicity and domestic partnership status.</p>	Yes	Align with federal, state, and local protected classes.
3-I.C.	N/A	<p>In accordance with Notice PIH 2017-08, for HUD–Veterans Affairs Supportive Housing (HUD–VASH) vouchers, when the veteran is the perpetrator of domestic violence, dating violence, sexual assault, or stalking, the victim must continue to be assisted. Upon termination of the perpetrator’s HUD–VASH voucher, the victim should be given a regular HCV if one is</p>	Yes	HUD Regulation

Section	Previous Policy	Proposed Policy	Required Change	Impact
		available, and the perpetrator's HUD-VASH voucher should be used to serve another eligible family. If a regular HCV is not available, the victim will continue to use the HUD-VASH voucher, which must be issued to another eligible family upon the voucher's turnover.		
3-I.E.	A marriage partner includes the partner in a "common law" marriage as defined in state law. The term "spouse" does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.	A marriage partner includes the partner in a "common law" marriage as defined in state law. The term "spouse" does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse. In the case of a common law marriage, to be recognized by the PHA, the marriage must meet the requirements of the state where the common-law marriage occurred.	No	Provides guidance on as to how the PHA will define common law marriage as the state of Oregon does not have common law marriage.
3-I.F.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.	No	Provides a parent the opportunity to house a child when the parents have joint custody.
3-I.J	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 51 percent of the time, are not subject to the time limitations of guests as described above.	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.	No	Provides a parent the opportunity to house a child when the parents have joint custody.
3-III.B.	The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.	The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed or is currently participating in a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.	No	Expands housing opportunities to those who are actively engaged in rehabilitation programs
3-III.B.	<i>Currently engaged in</i> is defined as any use of illegal drugs during the previous six months.	<i>Currently engaged in</i> is defined as any use of illegal drugs during the previous six months.	No	Expands housing opportunities to those who are actively

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>However, if the PHA is able to verify the household member who engaged in the illegal drug activity has completed, or is actively engaged, in a supervised drug rehabilitation program approved by the PHA, then the PHA will admit an otherwise eligible family.</p>		engaged in rehabilitation programs.
3-III.D.	<p>The PHA will perform a criminal background check through local law enforcement for every adult household member. If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, the PHA may request a fingerprint card and, if so, will request information from the National Crime Information center (NCIC).</p>	<p>The PHA will perform criminal background checks through the Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN) or a commercial screening company for all adult household members. If the adult household member has resided outside the state of Oregon in the last 3 years, if the results of the criminal background check through LEDS indicates there has been criminal activity outside the state of Oregon, or the adult household member self-discloses out-of-state criminal activity in the last 3 years a commercial screening company will be used. If the adult household member has resided in Oregon for the last 3 years and there is no indication of out-of-state criminal activity the PHA will use the Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN) to conduct the criminal background check.</p>	No	Ensures applicants residing in the PHA's jurisdiction prior to application are screened in the same manner as applicants residing outside the PHA's jurisdiction at time of application.
3-III.F.	<p>If based on a criminal record or sex offender registration information, an applicant family appears to be ineligible the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 14 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 14-day period, the denial of admission will stand. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the</p>	<p>If based on a criminal record or sex offender registration information, an applicant family appears to be ineligible the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 14 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 14-day period, the PHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official</p>	Yes	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
	opportunity to do so as part of the informal review process.	denial letter will still be given the opportunity to do so as part of the informal review process.		
3-III.G.	Form HUD 5382	Form HUD 5380 & HUD 5382	Yes	Compliance with VAWA regulations
4-I.D.	<p>The PHA will send written notification of the preliminary eligibility determination within 14 business days of receiving a complete application.</p> <p>Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list. Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers and according to any preference(s) for which they qualify.</p>	<p>Upon successful completion of an application the applicant will be provided a computer generated receipt from the HAPPY software waiting list. It is the responsibility of the applicant to retain this receipt as proof of successful application submission.</p> <p>Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list. Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers and according to any preference(s) for which they qualify.</p> <p>All successful applicant submissions will enter into a lottery. Those randomly selected will receive a letter assigning them their lottery number. Those who are not selected thru the random lottery process will receive a letter stating they were not selected.</p>	No	Added clarity
4-II.E.	While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes may be submitted in writing, via telephone, in person, or by email, and a note added to the applicant's electric file.	While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing, via telephone, in person, or by email, and a note added to the applicant's file.	No	Added clarity
4-II.F.	If the notice is returned by the post office the applicant will be removed from the waiting list without further notice.	<p>If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.</p> <p>If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 14</p>	No	Increases an applicant's opportunity to apply for housing if the applicant has moved.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		business days to respond from the date the letter was re-sent.		
4-III.C.	N/A	Under this policy selected is defined as the date in which the voucher was issued.	No	Added clarity
4-III.D.	If a notification letter is returned to the PHA, the family will be removed from the waiting list without further notice.	If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.	No	Increases an applicant's opportunity to apply for housing if the applicant has moved.
5-I.B.	If the notice is returned by the post office, the applicant will be denied and their name will not be placed back on the waiting list.	If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated.	No	Increases an applicant's opportunity to apply for housing if the applicant has moved.
5-I.B.	Information about the protections afforded by the Violence against Women Act of 2013 (VAWA) to victims of domestic violence, dating violence, sexual assault, and stalking (see section 16-IX.C)	The form HUD-5380 domestic violence certification form and the form HUD-5382 notice of occupancy rights, which contains information on VAWA protections for victims of domestic violence, dating violence, sexual assault, and stalking	Yes	Compliance with VAWA regulations
5-II.E.	The PHA will approve extensions beyond 120 days only if an extension is necessary as a reasonable accommodation for a person with disabilities. In such case, the PHA will decide whether to approve or deny an extension in line with the PHA's Reasonable Accommodation process.	The PHA will approve additional extensions 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 PHA. Following is a list of extenuating circumstances that the PHA 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 Other family emergency Obstacles due to employment Whether the family has already submitted requests for tenancy approval that were not approved by the PHA Whether family size or other special circumstances make it difficult to find a suitable unit	No	Allows a family the possibility of additional time to locate housing when the reason housing was not found was beyond the family's control.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.</p> <p>All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).</p> <p>The PHA will decide whether to approve or deny an extension request within 14 business days of the date the request is received, and will immediately provide the family written notice of its decision.</p>		
6-I.B.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time.	Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.	No	Allows parents with joint custody to decide who will receive subsidy and avoid legal processes.
6-I.G.	<p>The PHA will initially set the imputed asset passbook rate within 0.75 percent of the national rate established by the Federal Deposit Insurance Corporation (FDIC).</p> <p>The PHA will review the passbook rate annually, in December of each year. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be adjusted accordingly.</p> <p>Changes to the passbook rate will take effect on January 1 following the December review.</p>	<p>The PHA will initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).</p> <p>The PHA will review the passbook rate annually, in December of each year. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.</p> <p>Changes to the passbook rate will take effect on February 1 following the December review.</p>	No	Allows for sufficient notice to tenant of change.
6-III.D.	At reexamination, the PHA must use the PHA current utility allowance schedule [24 CFR 982.517(d)(2)]	At reexamination, the PHA must use the PHA current utility allowance schedule HCV GB, p. 18-8	Yes	HCV Guidebook reference
Throughout Chapter 7	HUD's Verification Hierarchy [Notice PIH 2010-19]	HUD's Verification Hierarchy [Notice PIH 2017-12]	Yes	PIH Notice update
7-I.D.	The PHA will send third-party verification forms directly to the third party.	The PHA may send third-party verification forms directly to the third party.	No	Allows flexibility for tenant to provide verification

Section	Previous Policy	Proposed Policy	Required Change	Impact
7-I.D.	<p>For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every year thereafter.</p>	<p>For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every three years thereafter.</p>	No	Families with assets below \$5,000 only have to provide bank statement every 3 years.
8-I.E.	<p>If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an environmental intervention blood lead level, the PHA must complete a risk assessment of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. The risk assessment must be completed in accordance with program requirements, and the result of the risk assessment must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner. Within 30 days after receiving the risk assessment report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in violation of HQS and the PHA will take action in accordance with Section 8-II.G.</p>	<p>If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an elevated environmental investigation of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. The environmental investigation must be completed in accordance with program requirements, and the result of the environmental investigation must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner. Within 30 days after receiving the environmental investigation report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in</p>	Yes	Provides Clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
	PHA reporting requirements, and data collection and record keeping responsibilities related to children with an environmental intervention blood lead level are discussed in Chapter 16.	violation of HQS and the PHA will take action in accordance with Section 8-II.G. PHA reporting requirements, and data collection and record keeping responsibilities related to children with an elevated blood lead level are discussed in Chapter 16.		
8-II.B.	If utility service is not available for testing at the time of the initial inspection, the PHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The PHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the PHA.	If utility service (electric, gas, water) is not available for testing at the time of the initial inspection, the PHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The PHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the PHA. If the family is responsible for supplying the trash service, the PHA will allow the trash service to be placed in the unit after the unit has met all other HQS requirements. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon certification from the family that the trash service has been installed. Trash service is defined as: a garbage can with a lid that will be transported to a recycling/trash center on a regular basis or service from a local trash removal provider such as Sanipac or Lane Apex.	No	Allows a family to provide written verification of trash service.
8-III.B.	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination.	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination. If the requested increase is determined unreasonable then the owner will need to provide three comparable unassisted units.	No	Aligns with the PHA's process of providing rent comparable when not owner provided.
8-III.D.	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination.	The PHA will determine whether the requested increase is reasonable within 30 days prior to when the increase is to be implemented. The owner will be notified of the determination. If the requested increase is determined unreasonable then the owner will need to provide three comparable unassisted units.	No	Aligns with the PHA's process of providing rent comparable when not owner provided.

Section	Previous Policy	Proposed Policy	Required Change	Impact
Exhibit 8-1	<p>Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:</p> <ul style="list-style-type: none"> • Disclose known lead-based paint hazards to prospective tenants before the lease is signed, • provide all prospective families with "Protect Your Family from Lead in Your Home", • Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by the PHA • Notify tenants each time such an activity is performed • Conduct all work in accordance with HUD safe practices • As part of ongoing maintenance ask each family to report deteriorated paint. <p>For units occupied by environmental intervention blood lead level (lead poisoned) children under six years of age, a risk assessment must be conducted (paid for by the PHA). If lead hazards are identified during the risk assessment, the owner must complete hazard reduction activities.</p> <p>See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.</p>	<p>Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:</p> <ul style="list-style-type: none"> • Disclose known lead-based paint hazards to prospective tenants before the lease is signed, • provide all prospective families with "Protect Your Family from Lead in Your Home", • Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by the PHA • Notify tenants each time such an activity is performed • Conduct all work in accordance with HUD safe practices • As part of ongoing maintenance ask each family to report deteriorated paint. • Maintain covered housing without deteriorated paint if there is child under six in the family. <p>For units occupied by elevated blood lead level (lead poisoned) children under six years of age, an environmental investigation must be conducted (paid for by the PHA). If lead hazards are identified during the environmental investigation, the owner must complete hazard reduction activities within 30 days.</p> <p>See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.</p>	Yes	Provides clarity
9-I.B.	<p>Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, or by fax. The family may not submit, and the PHA will not process, more than one (1) RTA at a time. When the family submits the RTA the PHA will review the RTA for completeness.</p>	<p>Completed RTA must be submitted as hard copies, in-person, by mail, email, or by fax. The family may not submit, and the PHA will not process, more than one (1) RTA at a time. When the family submits the RTA the PHA will review the RTA for completeness. If the RTA is incomplete (including lack of signature by family, owner, or both) the PHA</p>	No	Allows e-mail as an acceptable method to provide documents to the PHA.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>If the RTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RTA, the PHA will notify the family and the owner of the deficiencies.</p> <p>Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, or by fax. If the PHA deems necessary, the PHA will accept missing information over the phone, clearly noting the changes in red and noting who authorized the change.</p>	<p>will notify the family and the owner of the deficiencies.</p> <p>Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, email, or by fax. If the PHA deems necessary, the PHA will accept missing information over the phone, clearly noting the changes in red and noting who authorized the change.</p>		
9-I.E.	<p>If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept missing and corrected information over the phone</p>	<p>If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, email, or by fax. The PHA will not accept missing and corrected information over the phone</p>	No	Allows e-mail as an acceptable method to provide documents to the PHA.
10-I.A.	<p>If a family requests permission to move with continued assistance based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request documentation in accordance with section 16-IX.D of this plan.</p> <p>The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.</p> <p>The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan.</p>	<p>If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the PHA based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request that the resident request the emergency transfer using form HUD-5383, and the PHA will request documentation in accordance with section 16-IX.D of this plan.</p> <p>The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.</p> <p>Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.</p>	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan, and discusses external transfers to other covered housing programs.		
10-II.B.	For participating families approved to move under portability, the PHA will issue a new voucher within 14 business days of the PHA's written approval to move. The initial term of the voucher will be 120 days .	For participating families approved to move under portability, the PHA will issue a new voucher within 14 business days of the PHA's written approval to move. The initial voucher term will be 60 calendar days .	No	Allows the PHA to issue vouchers for an initial term of 60 days.
10-II.C.	The PHA will send a copy of the updated HUD-50058 by regular mail no later than 10 business days after the effective date of the reexamination.	The PHA will send a copy of the updated HUD-50058 by regular mail no later than 14 business days after the effective date of the reexamination.	No	Aligns with other PHA policies that provide 14 business days.
11-I.C.	An advocate, interpreter, or other assistant may assist the family in the reexamination process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any such third party.	An advocate, interpreter, or other assistant may assist the family in the reexamination process.	No	Streamlines the ability for the advocate to provide assistance for the family.
11-II.D.	Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, or in person.	Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 14 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, email , or in person.	No	Allows flexibility for tenant to provide verification by further defining acceptable format.
11-III.B.	At reexamination, the PHA must use the PHA current utility allowance schedule [24 CFR 982.517(d) (2)].	At reexamination, the PHA must use the PHA current utility allowance schedule HCV GB, p. 18-8].	Yes	Guidebook Reference
12-I.E.	The PHA will not terminate a family's assistance because of the family's failure to meet its obligations under the Family Self-Sufficiency program.	Additionally, per the alternative requirements listed in the Federal Register notice dated December 29, 2014, PHAs are no longer permitted to terminate assistance to a family due to the family's failure to meet its obligations under the Family Self-Sufficiency (FSS) contract of participation [FR Notice 12/29/14].	Yes	Allows families to participate in the Family Self Sufficiency Program without losing Section 8 assistance.
12-II.E.	Even when a victim poses an actual and imminent threat, however, HUD regulations	In order to demonstrate an actual and imminent threat, the PHA must have objective evidence of	Yes	Clarifies evidence necessary to determine

Section	Previous Policy	Proposed Policy	Required Change	Impact
	authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d) (3)].	words, gestures, actions, or other indicators. Even when a victim poses an actual and imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d) (3)].		whether the victim of domestic violence is a threat to others.
12-II.E.	Whether the threat is likely to happen within a short period of time	Whether the threat is likely to happen within an immediate time frame.	No	Factors in immediate time frame when determining whether a program participant domestic violence victim is a threat to others on the property.
12-II.E.		If the perpetrator remains in the unit, the PHA continues to pay the owner until the PHA terminates the perpetrator from the program. The PHA must not stop paying HAP until 30 days after the owner bifurcates the lease to evict the perpetrator. The PHA may pay HAP for the full month if the 30-day period will end mid-month [Notice PIH 2017-08]. If the perpetrator is the only participant eligible to receive assistance, the PHA will provide any remaining participant a chance to establish eligibility for the program. If the remaining participant cannot do so, the PHA will provide them with 30 days to establish eligibility for another housing program prior to termination of the HAP contract.	Yes	Clarifies assistance term for domestic violence perpetrators.
EXHIBIT 12-1	N/A	The family must not engage in abusive or violent behavior towards PHA personnel. Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior. Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.	No	Provides protection for staff

Section	Previous Policy	Proposed Policy	Required Change	Impact
13-II.E.	In all cases, the HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives written notice to the owner. The owner is not entitled to any housing assistance payment after this period, and must return to the PHA any housing assistance payment received after this period.	In accordance with HUD requirements, the PHA will never pay HAP for any month after the month the family vacates the unit. This includes the death of the sole family member. In all other cases HAP would terminate the end of the month following the month the Landlord is notified.	No	Provides clarity for when HAP will and will not be paid.
13-II.E.	N/A	The subsidy between the old unit and the new unit will not overlap for more than five (5) calendar days.	No	Provides clarity for when HAP will and will not be paid.
CH 15	Families will be permitted to use the Homeownership option. Families will not be permitted to use any other special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.	Families will be permitted to use the Homeownership option. Families will be permitted to use the Single Room Occupancy. Families will be permitted to use the Shared Housing. Families will not be permitted to use any other special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.	No	Expanding housing opportunities by opening up Shared Housing.
15-VII.F.	If required by the PHA, families must attend and complete post-purchase ongoing homeownership counseling.	Remove language	No	No longer an available option.
15-VII.H.	As a check against predatory lending, the PHA will review the financing of each purchase transaction, including estimated closing costs. The PHA will review the loans for features, such as balloon payments, adjustable rate mortgages, and unusually high interest rates, all of which are prohibited. The PHA also will not approve "seller financing" or "owner-held" mortgages. Beyond these basic criteria, the PHA will rely on the lenders to determine that the loan will be affordable to program participants.	As a check against predatory lending, the PHA will review the financing of each purchase transaction, including estimated closing costs. The PHA will review the loans for features, such as balloon payments, adjustable rate mortgages, and unusually high interest rates, all of which are prohibited. The PHA also will not approve "seller financing" " rent to own agreements " or "owner-held" mortgages. Beyond these basic criteria, the PHA will rely on the lenders to determine that the loan will be affordable to program participants.	No	Added Clarity
15-VII.I.	Effective with new homeownership clients starting the program January 1, 2017 or later, homeownership clients are required to meet with their designated Housing Specialist in an in-person interview annually, either at the HACSA office or in the client's home. At this meeting the family must provide documentation of	Effective with new homeownership clients starting the program January 1, 2017 or later, homeownership clients may request to meet with their designated Housing Specialist in an in-person interview annually, either at the Homes for Good office or in the client's home. At this meeting the family must provide	No	Aligns with HQS rules

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>money spent on home repairs or provide documentation showing that they are saving at least the amount of their monthly maintenance/repair allowance.</p> <p>For new clients starting the program effective January 1, 2017 or later, inspections will be done on a semi-annual basis. Results of this inspection will be discussed with the client at an annual meeting with agency staff that will be scheduled within two weeks of the inspection. The family will be encouraged to make necessary repairs and potential budgeting and access to community resources to assist with repairs will be discussed at this meeting. Clients will not be required to do repairs as a condition for ongoing assistance.</p>	<p>documentation of money spent on home repairs or provide documentation showing that they are saving at least the amount of their monthly maintenance/repair allowance.</p>		
15-VII.K.	<p>The PHA's housing assistance payment will be paid directly to the lender. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.</p>	<p>The PHA's housing assistance payment will be normally paid directly to the lender, unless the lender will only accept one payment per month. If the lender refuses multiple monthly payments, the PHA will pay the HAP directly to the client. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.</p>	No	Added Clarity
15-VII.L.	<p>The PHA issues transfer vouchers for 120 days.</p>	<p>The PHA issues transfer vouchers for 60 calendar days.</p>	No	Allows the PHA to issue vouchers for an initial term of 60 days.
15-VII.N.	<p>The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy.</p>	<p>The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy, with the exception of failure to meet obligations under the Family Self-Sufficiency program as prohibited under the alternative requirements set forth in FR Notice 12/29/14.</p>	Yes	Regulation change
16-II.B.	<p>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 PHA's current payment standard amounts will be outside the basic range</p>	<p>Changes to payment standard amounts will be effective on January 1st of every year, or within three months of the FMR effective date. The effective date is applicable both to HUD-required revisions and to discretionary revisions.</p>	Yes	Allows PHA to modify Payment Standards within three months of FMR changes even when the FMR change

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>when the final FMRs are published. In that case, the PHAs payment standards will be effective October 1st instead of December 1st. If the PHA 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 PHA will make retroactive adjustments to any such reexaminations if the new payment standard amount is higher than the one used by the PHA at the time the reexamination was originally processed.</p>			<p>results in the Payment Standard being outside of the 90% to 100% FMR range.</p>
16-III.C.	<p>A copy of the hearing must be furnished promptly to the family.</p>	<p>The hearing officer will mail a "Notice of Hearing Decision" to the PHA and to the participant within 14 business days from the date of the hearing. This notice will be sent by first-class mail. The participant will be mailed the original "Notice of Hearing Decision". A copy of the "Notice of Hearing Decision" will be maintained in the PHA's file.</p>	No	Provides clarity
16-III.C.	<p>The PHA will mail a "Notice of Final Decision" including the hearing officer's report to the participant and their representative. This notice will be sent by first-class mail. The participant will be mailed the original "Notice of Final Decision" and a copy of the "Notice of Final Decision" will be maintained in the PHA's file.</p>	<p>The Division Director has the authority to determine that the PHA is not bound by the decision of the hearing officer because the PHA was not required to provide a hearing, the decision exceeded the authority of the hearing officer, the decision conflicted with or contradicted HUD regulations, requirements, or the decision was otherwise contrary to federal, state, or local laws. In such a case, the PHA will mail a "Notice of Final Decision" to the PHA and the participant within 14 business days. The "Notice of Final Decision" will be sent by first-class mail. A copy of this notice will be maintained in the PHA's file.</p>	No	Provides clarity on regulation for how a PHA is to respond to the decision making of the hearings officer.
16-IV.B.	<p>If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will ban the owner from future participation in the program and pursue other modes of collection.</p>	<p>If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA may ban the owner from future participation in the program and pursue other modes of collection.</p>	No	Provides the PHA flexibility on whether to ban or not ban landlords who do not repay HAP.

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-VI.B.	N/A	The PHA must keep confidential records of all emergency transfer requested by victims of domestic violence, dating violence, sexual assault, and stalking under the PHA's Emergency Transfer Plan, as well as the outcomes of such requests, and retain the records for a period of three years [24 CFR 5.2002(e)(12)].	Yes	Provides privacy for victims of domestic violence.
16-VII.A.-C	"Environmental Intervention Blood Lead Level"	"Elevated Blood Lead Level"	Yes	Provides clarity
16-VII.B.	The PHA must report the name and address of a child identified as having an environmental intervention blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional.	The owner must report the name and address of a child identified as having an elevated blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional. The owner must also notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days. The PHA may collaborate with the owner on the notification process, such as by agreeing with the owner to provide the required notifications on the owner's behalf.	Yes	Provides clarity
16-VII.B.	The PHA will provide the public health department written notice of the name and address of any child identified as having an environmental intervention blood lead level.	Upon notification by the owner, the PHA will provide the public health department written notice of the name and address of any child identified as having an elevated blood lead level within five business days. Upon notification by the owner, the PHA will notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days.	Yes	Provides clarity.
16-IX.C.	N/A	The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		the PHA make alternative delivery arrangements that will not put the victim at risk.		
16-IX.C.	N/A	Whenever the PHA has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim. When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room. The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.	Yes	Compliance with VAWA regulations
16-IX.C.	The PHA will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the HCV program and at least annually thereafter.	The PHA will provide owners and managers with information about their rights and obligations under VAWA annually.	Yes	Compliance with VAWA regulations
16-IX.D.	(1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim	(1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.	Yes	Compliance with VAWA regulations
16-IX.D.	The PHA may, in its discretion, extend the deadline for 14 business days. Any extension granted by the PHA will be in writing.	The PHA may, in its discretion, extend the deadline for 14 business days. In determining whether to extend the deadline, the PHA will consider factors that may contribute to the victim's inability to provide documentation in a timely manner,	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim’s need to address health or safety issues. Any extension granted by the PHA will be in writing.</p> <p>Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 business days.</p>		
16-IX.D.	<p>In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3) within 30 calendar days of the date of the request for third-party documentation. The PHA must honor any court orders issued to protect the victim or to address the distribution of property.</p>	<p>In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3) The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA. Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08].</p>	Yes	Compliance with VAWA regulations
16-IX.D.	<p>If presented with conflicting certification documents (two or more forms HUD-5382) from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. The family will have 30 calendar days from the date of request by the PHA to provide this documentation.</p>	<p>If presented with conflicting certification documents from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. When requesting third-party documents, the PHA will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30</p>	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		calendar days from the date of the request to provide such documentation. If the PHA does not receive third-party documentation within the required timeframe (and any extensions) the PHA will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the PHA will hold separate hearings for the applicants or tenants.		
16-IX.D.	The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b).	The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.	Yes	Compliance with VAWA regulations
EXHIBIT 16-5	SAMPLE NOTICE TO HOUSING CHOICE VOUCHER OWNERS AND MANAGERS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)	MODEL OWNER NOTIFICATION OF RIGHTS AND OBLIGATIONS	Yes	Compliance with VAWA regulations
CH. 17	N/A	PIH 2017-21	Yes	HUD Regulation
17-I.A.	The PHA may project-base an additional 10 percent of its units above the 20 percent program limit, if the units	The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap. Units qualify under this exception if the units	Yes	Regulation provides definitions of what families are to be served under additional use of PBV.
17-I.A.	Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302).	Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.	Yes	Regulation provides definitions of what families are to be served under additional use of PBV.
17-I.A.	The PHA will not set aside units above the 20 percent program limit.	The PHA may aside units above the 20 percent program limit.	No	Provides the PHA the option to set aside units.

Section	Previous Policy	Proposed Policy	Required Change	Impact
17-I.A.	<p>In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. In order to be excepted, the unit must meet the following conditions:</p> <ul style="list-style-type: none"> • The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17; and • In the five years prior to the date the PHA either issued the RFP or selected the project, the unit either: <ul style="list-style-type: none"> - Received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for Elderly (Section 202), Housing for Persons with Disabilities (section 811), Rent Supplement (Rent Supp), or Rental Assistance Program (RAP); or - The unit was subject to a rent restriction through a loan or insurance program as a result of Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for Elderly Persons (Section 202), or Housing for Persons with Disabilities (Section 811) <p>Units that have previously received either PBV or HCV assistance are not covered under the exception.</p>	<p>In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17.</p>	Yes	Provides clarity.
17-I.A.	N/A	The PHA may project-base any units not subject to the 20 percent cap.	No	Provides clarity
17-II.B.	N/A	The PHA may attach PBVs to projects owned by the PHA as described above.	No	Provides clarity
17-II.B.	N/A	Any additional requirements will be noted in the Request for Proposal.	No	Allows PHA to produce Request for Proposals that give information as needed to the respondent for specific proposal requests.
17-II.B.	In addition, the PHA will publish its notice for selection of PBV proposals for two consecutive days in the same newspapers and trade journals the PHA used to solicit the proposals. The announcement will include the name of the	The PHA will post the notice of owner selection on its electronic web site.	No	Removes the need to publish PBV awards in the Register Guard.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	owner that was selected for the PBV program. The PHA will also post the notice of owner selection on its electronic web site.			
17-II.F.	<p>Exceptions are allowed and PBV units are not counted against the 25 percent or 25-unit per project cap if:</p> <ul style="list-style-type: none"> • The units are exclusively for elderly families • The units are for households eligible for supportive services available to all families receiving PBV assistance in the project • The project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates 	<p>As of April 18, 2017, units are not counted against the 25 percent or 25-unit per project cap if:</p> <ul style="list-style-type: none"> • The units are exclusively for elderly families • The units are for households eligible for supportive services available to all families receiving PBV assistance in the project • If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17]. 	Yes	Provides clarity.
17-II.F.	If a family at the time of initial tenancy is receiving, and while the resident of an excepted unit has received, FSS supportive services or any other supportive services as defined in the PHA administrative plan, and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit.	The PHA will evaluate supportive services based on community need.	No	Allows a variety of supportive service options to be implemented based on community need.
17-II.F.	The PHA will not provide assistance for excepted units. Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per project.	The PHA may provide assistance for excepted units.	No	Allows the PHA the option to provide assistance for excepted units.
17-III.D.	The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS	The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with HQS.	No	Provides clarity on PHA policy

Section	Previous Policy	Proposed Policy	Required Change	Impact
	inspection as a result of only non-life-threatening conditions, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions.			
17-III.D.	The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not enter into a HAP contract covering a unit until the unit fully complies with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions.	The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not enter into a HAP contract covering a unit until the unit fully complies with HQS.	No	Provides clarity on PHA policy
17-III.D.	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS.	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions or if the unit passed an alternative inspection.	Yes	Regulations provide clarification on potential HQS options.
17-IV.B.	The PHA will enter into the Agreement with the owner within 10 business days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.	The PHA will enter into the Agreement with the owner within 14 business days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.	No	Aligns with other PHA policies that provide 14 business days.
17-V.B.	For existing housing, the HAP contract will be executed within 10 business days of the PHA determining that all units pass HQS. For rehabilitated or newly constructed housing, the HAP contract will be executed within 10 business days of the PHA determining that the units have been completed in accordance with the agreement to enter into HAP, all units meet HQS, and the owner has submitted all required evidence of completion.	For existing housing, the HAP contract will be executed within 14 business days of the PHA determining that all units pass HQS. For rehabilitated or newly constructed housing, the HAP contract will be executed within 14 business days of the PHA determining that the units have been completed in accordance with the agreement to enter into HAP, all units meet HQS, and the owner has submitted all required evidence of completion.	No	Aligns with other PHA policies that provide 14 business days.
17-VI.C.	The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA	The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA	No	Provides information on current PBV waiting lists

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>currently has waiting lists for the following PBV projects: Under RAD PBV conversation PHA reserves the right to add additional waiting lists as needed to manage a PBV program.</p>	<p>currently has waiting lists for the following PBV projects: PHA reserves the right to add additional waiting lists as needed to manage a PBV program. Richardson Bridge – 2 bedroom & 3 bedroom waiting lists. With a total of 12 PBV.</p>		
17-VII.C.	N/A	<p>Emergency Transfers under VAWA [Notice PIH 2017-08] Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4). HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.</p>	Yes	Provides housing options for victims of domestic violence.
17-VII.C.	N/A	<p>When the victim of domestic violence, dating violence, sexual assault, or stalking has lived in the unit for less than one year, the PHA will provide several options for continued assistance. The PHA will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible. If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the PHA's public housing program. Such a decision will be made by the PHA based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such</p>	Yes	Compliance with VAWA regulations

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>families must be selected from the waiting list for the applicable program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.</p> <p>If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the PHA will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.</p> <p>If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the PHA's public housing program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking as part of the public housing ACOP in order to expedite this process.</p>		
17-VII.D.	<p>The PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:</p> <ul style="list-style-type: none"> • The units are exclusively for elderly families • The units are for households eligible for supportive services available to all families receiving PBV assistance in the project • The project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates 	<p>As of April 17, 2018 the PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:</p> <ul style="list-style-type: none"> • The units are exclusively for elderly families • The units are for households eligible for supportive services available to all families receiving PBV assistance in the project • If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 	Yes	Provides clarity.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].		
17-VIII.B.	N/A	The PHA may apply SAFMRs to the PHA's PBV program.	Yes	Provides the option to apply SAFMRs.
18-II.C.	N/A	The definition of control/ownership provided under Notice PIH 2012-32, REV-3 (listed above) is used specifically to determine whether a PHA retains control over a project for purposes of HUD's requirement for ownership or control of the covered project under RAD. For purposes of determining whether an independent entity will perform certain functions for the project, the definition of PHA-owned under Notice PIH 2017-21 is used. This is the same definition used for standard PBV units. In some cases, a project may meet the RAD definition of ownership or control, but may not be considered PHA-owned for purposes of requiring an independent entity.	Yes	Provides clarity.
18-III.D.	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS.	Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions or if the unit passed an alternative inspection.	Yes	Regulations provide clarification on potential HQS options.
18-III.D.	N/A	The PHA will not provide assistance in turnover units until the unit fully complies with HQS.	Yes	Added Clarity
18-IV.C.	The PHA will not float assistance among unoccupied units within the project.	The PHA may float assistance among unoccupied units within the project.	No	Provides the PHA the option to move units within a project to provide housing.
18-IV.F.	The PHA will provide vacancy payments to the owner. The HAP contract with the owner will contain the amount of the vacancy payment and the period for which the owner will qualify for these payments.	The PHA may provide vacancy payments to the owner. The HAP contract with the owner will contain the amount of the vacancy payment and the period for which the owner will qualify for these payments.	No	Allows the PHA to address vacancy payments in the HAP Contract.
18-V.E.	The PHA will not offer any preferences for the RAD PBV program or for particular PBV projects or units.	The PHA may offer any preferences for the RAD PBV program or for particular PBV projects or units.	No	Allows the PHA the ability to serve special

Section	Previous Policy	Proposed Policy	Required Change	Impact
				need populations within PBV.
18-VI.E.	The PHA will maintain a combined, agency-wide waiting list for all standard PBV and RAD PBV families wishing to exercise mobility after one year of tenancy. This list will be maintained separately from the tenant-based HCV list. Families on the choice mobility waiting list will be given priority over families on the tenant-based waiting list. The choice mobility waiting list will be organized by date and time of the family's written request to exercise choice mobility. The list will also identify whether families live in standard or RAD PBV units.	PBV and RAD PBV families wishing to exercise mobility after one year of tenancy will be maintained amongst the tenant-based HCV list, and will be denoted with a preference point. This preference point will drive the family to the top of the tenant-based HCV list. Families on the choice mobility waiting list will be given priority over families on the tenant-based waiting list. The choice mobility waiting list will be organized by date received of the family's written request to exercise choice mobility.	No	Provides clarity
18-VI.E.	N/A	Emergency Transfers under VAWA	Yes	Compliance with VAWA regulations