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KEY MODIFICATIONS TO THE HOMES FOR GOOD RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2023 EFFECTIVE DATE 10-1-2022 TO 9-30-2023

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

Chapter 2: Fair Housing and Equal Opportunity

Chapter 3: Eligibility

Chapter 4: Applications, Waiting List, and Tenant Selection

Chapter 5: Briefings and Voucher Issuance

Chapter 7: Verification

Chapter 8: Housing Quality Standards and Rent Reasonableness Determinations

Chapter 11: Reexaminations

Chapter 15: Special Housing Types

Chapter 16: Program Administration

Chapter 17: Project-Based Vouchers

Chapter 18: Project-Based Vouchers (PBV) Under the Rental Assurances Demonstration (RAD) Program

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-2022**

Section	Previous Policy	Proposed Policy	Required Change	Impact
2-I.A.	Executive Orders 11063	Executive Orders 11063 and 13988	Yes	Prevent discrimination on gender identity or sexual orientation
2-II.E.	<p>After a request for an accommodation is presented, the PHA will respond, in writing, within 14 business days. If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.</p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 14 business days from the date of the most recent discussion or communication with the family.</p>	<p>After a request for an accommodation is presented, the PHA will respond, in writing, within 14 business days.</p> <p>If the PHA denies a request for an accommodation because there is no relationship, or nexus, found between the disability and the requested accommodation, the notice will inform the family of the right to appeal the PHA's decision through an informal review (if applicable) or informal hearing (see Chapter 16).</p> <p>If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.</p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, in writing, of its determination within 14 business days from the date of the most recent discussion or communication with the family.</p>	No	Provides clear guidance of steps

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2-III.B.	<p>The PHA will utilize a language line for telephone interpreter services.</p> <p>Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The interpreter may be a family member or friend.</p>	<p>The PHA will utilize a language line for telephone interpreter services.</p> <p>When exercising the option to conduct remote briefings, informal reviews, or hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.</p> <p>Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely on the minor to serve as the interpreter.</p>	No	Allows additional access points to engage with Homes for Good
3-I.L.	<p>The PHA will request verification of the family member's permanent absence from a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis, they may present, and the PHA will consider, any additional documentation or evidence.</p>	<p>An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.</p> <p>The PHA will request verification of the family member's permanent absence from a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis, they may present, and the PHA will consider, any additional documentation or evidence.</p>	No	Provides clarity on who is a family member
3-I.M.	<p>A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family may submit a new, written request-</p>	<p>A family's request for a live-in aide may be made either orally or in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family</p>	No	Provides flexibility on how families can communicate their request for a live in aide.

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	subject to PHA verification-at each annual reexamination.	member. For continued approval, the family may submit a new, written request-subject to PHA verification-at each annual reexamination.		
3-II.B.	The PHA will not provide assistance to a family before the verification of at least one family member.	The PHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible non-citizen.	No	Provides clarification for eligibility
3-II.F.	None	<p>Existing Tenant Search Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance. If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.</p> <p>PHA Policy The PHA will contact the PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The PHA will only approve assistance contingent upon the move-out from the currently occupied assisted unit.</p> <p>Debts Owed to PHAs and Terminations All adult household members must sign the form HUD-52675 Debts Owed to Public Housing</p>	Yes	Ensure recipients are not receiving subsidy elsewhere or owe debts to other Public Housing Agencies.

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		<p>and Terminations. Prior to admission to the program, the PHA must search for each adult family member in the Debts Owed to PHAs and Terminations module.</p> <p>If a current or former tenant disputes the information in the module, the tenant should contact the PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If the PHA determines that the disputed information is incorrect, the PHA will update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.</p> <p>PHA Policy</p> <p>The PHA will require each adult household member to sign the form HUD-52675 once at the eligibility determination. Any new members added to the household after admission will be required to sign the form HUD-52675 prior to being added to the household.</p> <p>The PHA will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, the PHA will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.</p> <p>Income and IVT Reports</p> <p>For each new admission, the PHA is required to review the EIV Income and IVT Reports to confirm and validate family reported income within 120 days of the IMS/PIC submission date of the new admission. The PHA must print and</p>		

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		maintain copies of the EIV Income and IVT reports in the tenant file and resolve any discrepancies with the family within 60 days of the EIV Income or IVT report dates.		
3-III.C.	<p>The family owes rent or other amounts to any PHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt prior to being selected from the waiting list.</p> <p>If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.</p> <p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.</p>	<p>The family owes rent or other amounts to any PHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt or enters into a repayment agreement when selected from the waiting list.</p> <p>If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt or enters into a repayment agreement when selected from the waiting list.</p> <p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement or enters into a repayment agreement when selected from the waiting list.</p>	No	Provides access to housing even while debts may be owed
4-II.F.	<p>To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list. The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 30 business days from the date of the PHA letter.</p> <p>If the family fails to respond within 30 business days, the family will be removed from the waiting list without further notice.</p>	<p>To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list without further notice.</p> <p>The family's response must be in writing and may be delivered in person, by mail, by email, or by fax. Responses should be postmarked or received by the PHA not later than 30 business days from the date of the PHA letter.</p>	No	Provides clarity on how removal from the waitlist happens

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	<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 30 business days to respond from the date the letter was re-sent.</p>	<p>If the family fails to respond within 30 business days, the family will be removed from the waiting list without further notice.</p> <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 30 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frames, the family will be removed from the waiting list without further notice.</p>		
<p>4-III.D.</p>	<p>The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:</p> <p>How to obtain an application packet</p> <p>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.</p>	<p>The PHA will notify the family by first class mail when it is selected from the waiting list. The notification will contain the full application packet.</p> <p>If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list, without further notice.</p>	<p>No</p>	<p>Provides clarity on how the process functions.</p>
<p>5-I.B.</p>	<p>The PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed individually or in groups. At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973), and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.</p> <p>PHA Policy</p> <p>Briefings may be conducted in group meetings or remotely.</p> <p>Generally, all adult family members are required to attend the briefing. If any adult member is unable to attend, the PHA may waive this requirement as long as the</p>	<p>Prior to issuance of a voucher, the PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed in individual face-to-face meetings, through group briefing sessions, or via remote briefing sessions.</p> <p>PHA Policy</p> <p>Families will be notified of their eligibility for assistance at the time they are invited to a briefing. The notice will be sent by first class mail and may also be sent by email if the family has provided a valid email address to the PHA.</p> <p>The notice will advise the family of the type of briefing, who is</p>	<p>Yes</p>	<p>Allows for remote briefings</p>

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	<p>head, spouse, or co-head attends the briefing. Families that attend group or remote briefings and still need individual assistance will be referred to an appropriate PHA staff person. Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan (See Chapter 2).</p> <p>Notification and Attendance PHA Policy Families will be notified of their eligibility for assistance at the time they are invited to attend a briefing. The notice will identify who is required to attend the briefing, as well as the date and time of the scheduled briefing, and if briefing held remotely how to access the briefing. 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. Applicants who fail to attend a scheduled briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).</p>	<p>required to be present at the briefing, and the date and time of the briefing. The notice will also inform the family of any additional requirements for in-person or remote briefings as addressed in relevant policy elsewhere in this section. 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 resent to the address indicated.</p> <p>In-Person Briefings At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2. PHA Policy In-person briefings will generally be conducted in group meetings. At the family's written or oral request, the PHA may provide an individual briefing. Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, the PHA may approve another adult family member to attend the briefing. Families that attend group briefings and still need individual</p>		

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		<p>assistance will be referred to an appropriate PHA staff person. Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA's LEP plan (See Chapter 2).</p> <p>Attendance PHA Policy Applicants who fail to attend a scheduled in-person briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).</p> <p>Remote Briefings [Notice PIH 2020-32] Remote briefings may be conducted over the phone, via video conferencing, or through other virtual platforms. PHA Policy The PHA has the sole discretion to require that briefings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. If the PHA schedules a remote briefing, the PHA will conduct a face-to-face briefing upon request of the applicant as a reasonable accommodation for a person with a disability if safety and health concerns can be reasonably addressed.</p>		

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		<p>In addition, the PHA will conduct a briefing remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have child care or transportation that would enable them to attend the briefing, or if the applicant believes an in-person briefing would create an undue health risk. The PHA will consider other reasonable requests for a remote briefing on a case-by-case basis.</p> <p>Accessibility Requirements for Persons with Disabilities and LEP Individuals As with in-person briefings, the platform for conducting remote briefings must be accessible and the briefing conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. If no method of conducting a remote briefing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate</p>		

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		<p>in the remote briefing, and the PHA should consider whether postponing the remote briefing to a later date is appropriate or whether there is a suitable alternative.</p> <p>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances.</p> <p>Limited English Proficiency (LEP) requirements also apply to remote briefings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote briefings.</p> <p>Conducting Remote Briefings The PHA must ensure that the lack of technology or inability to use technology for remote briefings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA must ensure that the family has appropriate technological access in order to fully participate in the remote briefing.</p> <p>PHA Policy At least 10 business days prior to scheduling the remote briefing, the PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the</p>		

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		<p>opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate.</p> <p>The PHA will conduct remote briefings via a video conferencing platform when available. If applicants are unable to adequately access the video conferencing platform, the briefing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in, the remote briefing will be postponed, and an in-person alternative or one-on-one briefing over the phone will be provided.</p> <p>The PHA will provide login information and/or conferencing call-in information and a copy of the briefing packet via email at least five business days before the briefing.</p> <p>The PHA will ensure that all electronic information stored or transmitted as part of the briefing meets the requirements for accessibility for persons with disabilities and persons with LEP, and is secure, including ensuring personally identifiable information (PII) is protected.</p> <p>The PHA will ensure that families who participate in remote briefings have the opportunity to ask questions as part of the briefing. If families lose connectivity during any remote briefing or otherwise feel they were unable to access information presented during the briefing, the family may request a</p>		

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		one-on-one briefing over the phone or in person with the PHA.		
7-III.I.	The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, and earnings are not being received by families claiming to have zero annual income.	The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, and earnings are not being received by families claiming to have zero annual income. Households that claim zero income may be required to fill out and submit the PHA's Zero Income Questionnaire.	No	Provides clarity to the process
7-IV.D.	<p>Information to be Gathered</p> <p>The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.</p> <p>Seeking Work</p> <p>Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.</p> <p>In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.</p> <p>Furthering Education</p> <p>The PHA will request third-party documentation to verify that the person permitted to further his or her education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.</p>	<p>Information to be Gathered</p> <p>The PHA may verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.</p> <p>Seeking Work</p> <p>Whenever possible the PHA may use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.</p> <p>In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA may review this information at each subsequent reexamination for which this deduction is claimed.</p> <p>Furthering Education</p>	No	Provides flexibility on how child-care is verified

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	<p>Gainful Employment</p> <p>The PHA will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.</p>	<p>The PHA may request third-party documentation to verify that the person permitted to further their education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.</p> <p>Gainful Employment</p> <p>The PHA may seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.</p>		
8-I.C.	<p>The following are considered life-threatening conditions:</p> <ul style="list-style-type: none"> Any condition that jeopardizes the security of the unit Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling Natural or LP gas or fuel oil leaks Any electrical problem or condition that could result in shock or fire Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit. Utilities not in service, including no running hot water Conditions that present the imminent possibility of injury Obstacles that prevent safe entrance or exit from the unit Absence of a functioning toilet in the unit Inoperable or missing smoke detectors Inoperable or missing Carbon Monoxide detectors in homes that contain a CO source If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II-G. If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H. The owner will be required to repair an inoperable smoke detector and/or Carbon Monoxide detector in a home with a CO source unless the PHA determines that the family has intentionally disconnected it (by removing 	<p>The following are considered life-threatening conditions:</p> <ul style="list-style-type: none"> Any condition that jeopardizes the security of the unit Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling Natural or LP gas or fuel oil leaks A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking or a strong odor is detected with potential for explosion or fire or that results in a health risk if inhaled Any electrical problem or condition that could result in shock or fire A light fixture is readily accessible, is not securely mounted to the ceiling or wall, and electrical connections or wires are exposed A light fixture has a missing or broken bulb, and the open socket is readily accessible to the tenant during the day-to-day use of the unit Any nicks, abrasions, or fraying of the insulation that exposes conducting wire Exposed bare wires or electrical connections 	No	Provides clarity on life threatening conditions under Housing Quality Standards.

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	<p>batteries or other means). In this case, the family will be required to repair the smoke detector and/or Carbon Monoxide detector within 24 hours.</p>	<p>Water leaking or ponding near any electrical device Any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit. Utilities not in service, including no running hot water Conditions that present the imminent possibility of injury Obstacles that prevent safe entrance or exit from the unit Absence of a functioning toilet in the unit Inoperable or missing smoke detectors as it pertains to HQS guidelines on placement in unit based on configurations of the unit. Inoperable or missing Carbon Monoxide detectors in homes that contain a CO source Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside A fuel-fired space heater is not properly vented or lacks available combustion air A non-vented space heater is present Safety devices on a fuel-fired space heater are missing or damaged The chimney or venting system on a fuel-fired heating, ventilation, or cooling system is misaligned, negatively pitched,</p>		

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		<p>or damaged, which may cause improper or dangerous venting of gas If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II-G. If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H. The owner will be required to repair an inoperable smoke detector and/or Carbon Monoxide detector in a home with a CO source unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector and/or Carbon Monoxide detector within 24 hours.</p>		
8-II.A.	None	<p>Remote Video Inspections (RVIs) [Notice PIH 2020-31] As an alternative to some or all on-site inspections, the PHA may, but is not required to, perform HQS inspections from a remote location using video streaming technology and a proxy at the inspection site. Since there may be some circumstances in which the application of technology provides insufficient information or evidence to allow the PHA to make appropriate determinations about whether a condition violates HQS, Notice PIH 2020-31 requires that if a PHA chooses to implement RVIs, the PHA should have policies and procedures in place to address such limitations. PHA Policy The PHA may conduct HQS inspection using RVI.</p>	Yes	Allows for remote inspections

Section	Previous Policy	Proposed Policy	Required Change	Impact
8-II.E.	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS. The unit sample must include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.</p>	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS. The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.</p>	Yes	Streamlines the monitor inspection process
11-II.C.	<p>Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).</p> <p>Families participating in the Family Self-Sufficiency (FSS) program may request and receive an increase in rent through an interim reexamination.</p> <p>The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</p>	<p>Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).</p> <p>The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</p>	No	Provides clarity, provides options for participants to increase escrow savings.
11-II.C.	<p>If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account.</p>	<p>If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination unless the family requests an interim to increase rent. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account.</p>	No	Provides clarity, provides options for participants in the FSS program to increase escrow savings.
11-II.D.	<p>The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until</p>	<p>The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be processed until after the</p>	No	Provides clarity on when a decrease will be processed when a change in income has occurred.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>after the date the change would have become effective, the change will be made retroactively.</p> <p>For example, an interim decrease is reported and all required documentation is provided to the PHA on April 30th, but the PHA was not able to verify the changes until May 15th, the interim change will be made retroactive to May 1st.</p>	<p>date the change would have become effective, the change will be made retroactively.</p> <p>A decrease that lasts less than 30 calendar days will not be processed.</p> <p>For example, an interim decrease is reported and all required documentation is provided to the PHA on April 30th, but the PHA was not able to verify the changes until May 15th, the interim change will be made retroactive to May 1st.</p>		
<p>15-VII.B.</p>	<p>The PHA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:</p> <ul style="list-style-type: none"> ● The family must participate and meet the graduation requirements for the Family Self-Sufficiency (FSS) Program. ● The family does not owe money to the PHA. ● The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year. 	<p>The PHA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:</p> <ul style="list-style-type: none"> ● The family does not owe money to the PHA. ● The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year. 	<p>No</p>	<p>Will expand the scope of who can participate in the Home Ownership program</p>
<p>15-VII.I.</p>	<p>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 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>	<p>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 may provide 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>	<p>No</p>	<p>Aligns with current process of not requiring documentation of emergency savings</p>
<p>16-III.B.</p>	<p>A request for an informal review must be made in writing or verbally, and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA's denial of assistance.</p> <p>The PHA must schedule and send written notice of the informal review within 14 business days of the family's request.</p>	<p>A request for an informal review must be made in writing or verbally, and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA's denial of assistance.</p> <p>The PHA must schedule and send written notice of the informal review within 14 business days of the family's request.</p> <p>If the informal review will be conducted remotely, at the time the PHA notifies the</p>	<p>No</p>	<p>Allows for Informal Reviews to be conducted remotely</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>family of the informal review, the family will be informed: Regarding the processes to conduct a remote informal review; That, if needed, the PHA will provide technical assistance prior to and during the informal review; and That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal review, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal review, as appropriate.</p>		
<p>16-III.B.</p>	<p>Remote Informal Reviews All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements and be in compliance with HUD regulations. PHA Policy The PHA has the sole discretion to require that informal reviews be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. In addition, the PHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have child care or transportation that would enable them to attend the informal review, or if the applicant believes an in-person informal review would create an undue health risk. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis.</p> <p>Conducting Remote Informal Reviews</p>	<p>Remote Informal Reviews [Notice PIH 2020-32] There is no requirement that informal reviews be conducted in-person and, as such, HUD allows PHAs to conduct all or a portion of their informal review remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal reviews, applicants may still request an in-person informal review, as applicable. PHA Policy The PHA has the sole discretion to require that informal reviews be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. In addition, the PHA may provide a remote option to conduct an informal review. The PHA may also provide an in-person informal review upon the applicant's request. The PHA will consider other reasonable requests for</p>	<p>Yes</p>	<p>Provides parameters on how Informal Reviews are to be conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>The PHA must ensure that the applicant has the right to hear and be heard.</p> <p>PHA Policy</p> <p>The PHA will conduct remote informal reviews via telephone conferencing call-in or via videoconferencing. If the informal review will be conducted via videoconferencing, the PHA will ensure that all applicants, applicant representatives, PHA representatives and the person conducting the informal review can adequately access the platform (i.e., hear, be heard, see, and be seen). If any applicant, applicant representative, PHA representative, or person conducting the informal review is unable to effectively utilize the videoconferencing platform, the informal review will be conducted by telephone conferencing call-in. Whether the informal review is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or conferencing call-in information before the review.</p>	<p>a remote informal review on a case-by-case basis.</p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals</p> <p>As with in-person informal reviews, the platform for conducting remote informal reviews must be accessible to persons with disabilities and the informal review must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</p> <p>PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal review process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>If no method of conducting a remote informal review is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal review, and the PHA should consider whether postponing the remote informal review to a later date is appropriate or whether there is a suitable alternative.</p> <p>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements. As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal reviews, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal reviews.</p> <p>Conducting Remote Informal Reviews</p> <p>The PHA must ensure that the lack of technology or inability to use technology for remote informal reviews does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal review and, if the family does not have the proper technology to fully participate, either postpone the informal review or provide an alternative means of access.</p> <p>As with in-person informal reviews, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal review. The</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>family must also be provided with an accessible means by which to transmit their own evidence.</p> <p>The PHA must ensure that the applicant has the right to hear and be heard. All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements and be in compliance with HUD regulations at 24 CFR 982.554 and guidance specified in Notice PIH 2020-32.</p> <p>PHA Policy</p> <p>The PHA will conduct remote informal reviews via a video conferencing platform, when available. If, after attempting to resolve any barriers, applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal review will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal review will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</p> <p>Prior to scheduling the remote review, the PHA will provide the family with login information and/or conferencing call-in information and an electronic and/or physical copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</p> <p>If the informal review is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal review at least 24 hours before the scheduled review through the mail, via email, or text. The PHA will scan and email copies of these documents to the PHA representative the same day. Documents will be shared electronically whenever possible. The PHA will ensure that all electronic information stored or transmitted with respect to the informal review is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</p>		
<p>16-III.C.</p>	<p>Remote Informal Hearings</p> <p>The PHA’s essential responsibility is to ensure informal hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote informal hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations.</p> <p>PHA Policy</p> <p>The PHA has the sole discretion to require that informal hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.</p>	<p>Remote Informal Hearings [Notice PIH 2020-32]</p> <p>There is no requirement that informal hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their informal hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal hearings, applicants may still request an in-person informal hearing, as applicable.</p> <p>PHA Policy</p> <p>The PHA has the sole discretion to require that informal hearings be conducted remotely in case of local,</p>	<p>Yes</p>	<p>Provides parameters on how Informal Hearings are to be conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>In addition, the PHA will conduct an informal hearing remotely upon request as a reasonable accommodation for a person with a disability, if a participant does not have child care or transportation that would enable them to attend the informal hearing, or if the participant believes an in-person hearing would create an undue health risk. The PHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis.</p> <p>Conducting Informal Hearings Remotely In conducting any informal hearing remotely, the PHA shall ensure due process and that all parties are able to have full access to the hearing.</p> <p>PHA Policy The PHA will conduct remote informal hearings via telephone conferencing call-in or via videoconferencing. If the informal hearing will be conducted via videoconferencing, the PHA will ensure that all participants, participant representatives, advocates, witnesses, PHA representatives, and the hearing officer can adequately access the platform (i.e., hear, be heard, see, and be seen). If any participant, representative, advocate, witness, PHA representative, or hearing officer is unable to effectively utilize the videoconferencing platform, the informal hearing will be conducted by telephone conferencing call-in. Whether the informal hearing is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or telephone call-in information before the hearing.</p>	<p>state, or national physical distancing orders, and in cases of inclement weather or natural disaster.</p> <p>In addition, the PHA may provide a remote option to conduct an informal hearing. The PHA may also provide an in-person informal hearing upon the participant’s request. The PHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis.</p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals As with in-person informal hearings, the platform for conducting remote informal hearings must be accessible to persons with disabilities and the informal hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal hearing process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.</p> <p>If no method of conducting a remote informal hearing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal hearing, and the PHA should consider whether postponing the remote hearing to a later date is appropriate or whether there is a suitable alternative. Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation will depend on the specific circumstances and requirements. As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal hearings.</p> <p>Conducting Informal Hearings Remotely The PHA must ensure that the lack of technology or inability to use technology for remote informal hearings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>conducting the remote informal hearing and, if the family does not have the proper technology to fully participate, either postpone the informal hearing or provide an alternative means of access.</p> <p>As with in-person informal hearings, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal hearing. The family must also be provided with an accessible means by which to transmit their own evidence.</p> <p>The PHA's essential responsibility is to ensure informal hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote informal hearings will be conducted in accordance with due process requirements, and will be in compliance with HUD regulations at 24 CFR 982.555 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.</p> <p>PHA Policy The PHA will conduct remote informal hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, participants are unable to adequately access the video conferencing platform at any point, or upon request, the informal hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>Prior to scheduling the remote hearing, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</p> <p>The PHA will ensure that all electronic information stored or transmitted with respect to the informal hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</p>		
<p>16-III.C.</p>	<p>In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following: The proposed action or decision of the PHA. A brief statement of the reasons for the decision, including the regulatory reference. The date the proposed action will take place. A statement of the family’s right to an explanation of the basis for the PHA’s decision. A statement that if the family does not agree with the decision the family may request an informal hearing of the decision. A deadline for the family to request the informal hearing. To whom the hearing request should be addressed. A copy of the PHA’s hearing procedures.</p>	<p>In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following: The proposed action or decision of the PHA. A brief statement of the reasons for the decision, including the regulatory reference. The date the proposed action will take place. A statement of the family’s right to an explanation of the basis for the PHA’s decision. A statement that if the family does not agree with the decision the family may request an informal hearing of the decision. A deadline for the family to request the informal hearing.</p>	<p>Yes</p>	<p>Provides clarity on how Informal remote Hearings are conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>That the family may request a remote informal hearing If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the family informing them of the right to request an informal hearing, the family will be notified that the informal hearing will be conducted remotely. The family will be informed of the processes involved in a remote informal hearing and that the PHA will provide technical assistance, if needed, before the informal hearing</p>	<p>To whom the hearing request should be addressed. A copy of the PHA’s hearing procedures. That the family may request a remote informal hearing</p>		
<p>16-III.C.</p>	<p>A request for an informal hearing must be made orally or in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA’s decision or notice to terminate assistance. The PHA must schedule and send written notice of the informal hearing to the family within 14 business days of the family’s request. The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the PHA may request documentation of the “good cause” prior to rescheduling the hearing. If the family does not appear within 20 minutes of the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA’s decision will stand.</p>	<p>A request for an informal hearing must be made orally or in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 14 business days from the date of the PHA’s decision or notice to terminate assistance. The PHA must schedule and send written notice of the informal hearing to the family within 14 business days of the family’s request. If the PHA hearing will be conducted remotely, at the time the notice is sent to the family, the family will be notified: Regarding the processes involved in a remote informal hearing; That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the PHA and the PHA will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its</p>	<p>Yes</p>	<p>Provides clarity on how Informal remote Hearings are conducted</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.</p> <p>If the family does not appear within 20 minutes of the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA's decision will stand.</p>		
16-III.C.	<p>The hearing will be conducted remotely or in-person. The PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the informal hearing. The PHA will mail copies of the hearing packet to the family, the family's representatives, if any, and the hearing officer at least three days before the scheduled informal hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA.</p>	<p>The hearing will be conducted remotely or in-person. The PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the informal hearing. The PHA will mail copies of the hearing packet to the family, the family's representatives, if any, and the hearing officer at least 14 business days before the scheduled informal hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA.</p>	No	Provides additional time for documentation to be provided to the family
16-III.C.	<p>For in-person or remote hearings, the PHA will not require pre-hearing discovery by the PHA of family documents directly relevant to the hearing.</p> <p>Copies of family documents will be presented at the time of the hearing. Immediately following the hearing, family documents will be copied and dispersed to relevant PHA staff at the PHA's expense.</p> <p>Documents will be shared electronically whenever possible.</p>	<p>For in-person or remote hearings, the PHA will not require pre-hearing discovery by the PHA of family documents directly relevant to the hearing.</p> <p>If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing . through the mail, via email, or fax. The PHA will scan and email copies of these documents to the hearing officer and the PHA representative the same day.</p>	No	Provides clarity on how remote Informal Hearings are to be conducted

Section	Previous Policy	Proposed Policy	Required Change	Impact
		Documents will be shared electronically whenever possible.		
16-III.C.	<p>Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.</p> <p>If either the PHA or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence. Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.</p>	<p>Hearsay Evidence is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.</p> <p>If either the PHA (or the family, if required in a remote hearing) fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence. Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.</p>	No	Provides clarity on the definition of Hearsay Evidence
16-VI.C.	<p>All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.</p> <p>PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.</p>	<p>All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.</p> <p>PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.</p> <p>The family will be allowed to request any documents at a cost of \$.25 per page.</p>	No	Allows families access to information within their applicant and/or participant files

Section	Previous Policy	Proposed Policy	Required Change	Impact
17-I.A.	The PHA may project-base any units not subject to the 20 percent cap.	The PHA may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.	No	Provides clarity on how to exceed the 20% cap
17-II.A.	The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in the following newspapers and trade journals. Register Guard In addition, the PHA will post the RFP and proposal submission and rating and ranking procedures on its electronic web site.	The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in the following newspapers and trade journals. Register Guard The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements. In addition, the PHA will post the RFP and proposal submission and rating and ranking procedures on its web site.	No	Provides clarity on what will be advertised on the Request for Proposals for PBV
17-II.G.	It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less. However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in: A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;	It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less. However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in: A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic	No	Provides clarity on which census tracts can exceed the 20% PBV cap

Section	Previous Policy	Proposed Policy	Required Change	Impact
		Community, Choice Neighborhood , or Renewal Community;		
17-V.C.	<p>The PHA will consider adding contract units to the HAP contract when the PHA determines that additional housing is needed to serve eligible low-income families. Circumstances may include, but are not limited to:</p> <p>The local housing inventory is reduced due to a disaster (either due to loss of housing units, or an influx of displaced families); and</p> <p>Voucher holders are having difficulty finding units that meet program requirements.</p>	<p>The PHA will add units to the contract on a case-by-case basis to ensure the availability of affordable housing as long as the addition of units does not exceed allowable project caps.</p>	No	Provides clarity on how to add additional units to PBV contracts
18-V.D.	<p>The PHA will maintain the project-specific waiting list in accordance with all applicable civil rights and fair housing regulations found at 24 CFR 903.7(b)(2)(ii)-(iv). The PHA will provide applicants full information about each development, including an estimate of the wait time, location, occupancy, number and size of accessible units, and amenities like day care, security, transportation, and training programs at each development with a site-based waiting list. The system for selection will be consistent with all applicable civil rights and fair housing laws and regulations and may not be in conflict with any imposed or pending court order, settlement agreement, or complaint brought by HUD.</p> <p>The PHA will assess any changes in racial, ethnic or disability-related tenant composition at each PHA site that may have occurred during the implementation of the site-based waiting list, based on confirmed and accurate PIC occupancy data. At least every three years, the PHA will use independent testers to assure that the site-based system is not being implemented in a discriminatory manner.</p> <p>The PHA will give priority to participants moving under a VAWA emergency transfer from one PBV development to another in accordance with Section 18-VI.E.</p>	<p>The PHA will maintain the project-specific waiting list in accordance with all applicable civil rights and fair housing regulations found at 24 CFR 903.7(b)(2)(ii)-(iv). The PHA will provide applicants full information about each development, including an estimate of the wait time, location, occupancy, number and size of accessible units, and amenities like day care, security, transportation, and training programs at each development with a site-based waiting list. The system for selection will be consistent with all applicable civil rights and fair housing laws and regulations and may not be in conflict with any imposed or pending court order, settlement agreement, or complaint brought by HUD.</p> <p>The PHA will give priority to participants moving under a VAWA emergency transfer from one PBV development to another in accordance with Section 18-VI.E.</p>	No	The change is in alignment with National best practices per Nan McKay. The assessment note in the previous policy are requirements of a Public Housing program but are not requirements of a Project Based Voucher program. The prior policy was never implemented as RAD is a recent addition to Homes for Good. Therefore, the impact is moot. This data is currently and will continue to be assessed on the Public Housing portfolio.

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>18-V.E.</p>	<p>Hayden Bridge Referrals received under this preference will be prioritized by date and time of referral. Preference will be given to: Displaced Family Preference (Fire or Natural Disaster) This preference applies to families who are displaced as a result of a fire or Natural Disaster. Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County and have written verification from a Homes for Good approved entity. The definition of "displaced" for this purpose will be included in the MOU/MOA with the qualified entity.</p>	<p>Hayden Bridge Referrals received under this preference will be prioritized by date and time of referral. Preference will be given to: Displaced Family Preference (Fire or Natural Disaster) This preference applies to families who are displaced as a result of a fire or Natural Disaster. Persons who claim they are being or have been displaced due to fire or Natural Disaster must be a resident of Lane County and have written verification from a Homes for Good approved entity. The definition of "displaced" for this purpose will be included in the MOU/MOA with the qualified entity. Transitional Homeless Family Preference This preference applies to transitional housing persons who are homeless and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity.</p>	<p>No</p>	<p>Expands local preferences for Hayden Bridge</p>