

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMISSIONS AND CONTINUED OCCUPANCY POLICIES (ACOP)
PROPOSED EFFECTIVE DATE 10-1-18**

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 4: Applications, Waiting List and Tenant Selection

- Create a new preference for applicants who are participating in case-management, with an organization with whom Homes for Good has an MOU outlining such a preference.

Chapter 5: Occupancy Standards and Unit Offers

- Increase Maximum Occupancy Standard by one, for each unit size

Chapter 8: Leasing and Inspections

- New adults must sign the lease or a new lease

Chapter 9: Reexaminations

- Resume conducting Interims for changes to income that would result in an increase in rent under two circumstances:
 - New sources of income
 - When an Interim has already been processed that decreased rent

Chapter 10: Pets

- Changes to pet verification timelines

Chapter 14: Grievances and Appeals

- Cost of copying hearing documents changed from \$5 plus \$0.05 per page to simply \$0.25 per page

Section	Previous Policy	Proposed Policy	Required Change	Impact
Throughout	HACSA www.hacsa.org	Homes for Good www.homesforgood.org	Yes	Agency rebranding process
Throughout	Notice PIH 2010-19 Notice PIH 2015-13	Notice PIH 2017-12 Notice PIH 2017-23	Yes	Updated versions of same notices
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 resident 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 resident family 50 percent or more of the time.	No	Added Clarity
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 public housing unit 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 public housing unit more than 50 percent of the time, are not subject to the time limitations of guests as described above.	No	Added Clarity
3-II.A	To be income eligible, the annual income of an applicant must be within the low-income limit.	To be income eligible, a family must be a low-income family.	No	Added clarity
3-III.A 3-III.F	In addition, HUD requires or permits the PHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this area is limited by the Violence against Women Act of 2013 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking [24 CFR 5.2005(b)].	In addition, HUD requires or permits the PHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this area is limited by the Violence against Women Act of 2013 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis or as a direct result of the fact that the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking [24 CFR 5.2005(b)].	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.F	VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a notice of VAWA rights and the form HUD-5382 at the time the applicant is denied.	VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a VAWA Notice of Occupancy Rights (form HUD-5380) and a domestic violence certification form (HUD-5382) at the time the applicant is denied.	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>3-III.F</p>	<p>The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record) that would warrant denial under the PHA’s policies.</p> <p>Therefore, if HACSA makes a determination to deny admission to an applicant family, the HACSA will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382.</p>	<p>Homes for Good acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, poor rental history, a record of previous damage to an apartment, a prior arrest record) due to adverse factors that would warrant denial under Homes for Good’s policies.</p> <p>While Homes for Good is not required to identify whether adverse factors that resulted in the applicant’s denial are a result of domestic violence, dating violence, sexual assault, or stalking, the applicant may inform Homes for Good that their status as a victim is directly related to the grounds for the denial. Homes for Good will request that the applicant provide enough information to Homes for Good to allow Homes for Good to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim.</p> <p>Homes for Good will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382.</p>	<p>No</p>	<p>Compliance with new VAWA guidance</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>3-III.D</p>	<p>HACSA will perform criminal background checks through local law enforcement or a commercial screening company for all adult household members.</p> <p>If the results of the criminal background check indicate there may have been past criminal activity, but the results are inconclusive, or if the applicant resided outside of the state of Oregon, HACSA may request a fingerprint electronically and may request information from the National Crime Information Center (NCIC).</p> <p>HACSA may use the Oregon State Police Law Enforcement Data System (LEDS) database and court records or a commercial screening company to screen applicants for admission.</p>	<p>Homes for Good 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.</p> <p>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 Homes for Good will use the Oregon State Police Law Enforcement Data System (LEDS) database and Oregon court records (OJIN) to conduct the criminal background check.</p> <p>An additional layer of screening (for example, through a commercial screening company or the National Crime Information Center) will be used if: the adult household member has resided outside the state of Oregon in the last 3 years, 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.</p>	<p>No</p>	<p>Allows for a more-similar screening process for in-state and out-of-state applicants</p>
<p>3-III.E</p>	<p>HACSA will require the applicant to submit evidence of the household member’s successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.</p>	<p>Homes for Good may require the applicant to submit evidence of the household member’s successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.</p>	<p>No</p>	<p>Provide greater flexibility in evaluating case-by-case circumstances</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
4.III.B	-N/A-	Homes for Good will apply a waiting list preference worth 5 points for applicants who are case-managed by a service provider with whom the Homes for Good Property Management Division has a signed Memorandum of Understanding (MOU) outlining such a preference. The preference will be specific to the properties and service providers covered by the MOU.	No	Creates a new preference by which Homes for Good can more effectively partner with local agencies to address community needs.
4-III.B	-N/A-	Homes for Good has mixed population developments at the following properties: <ul style="list-style-type: none"> • Portion of AMP 100 Laurelwood Homes (1-bedroom units) • Portion of AMP 200 McKenzie Village (1-bedroom units) • AMP 400 Parkview Terrace • AMP 500 Lindeborg Place • AMP 500 Veneta Villa • AMP 600 Cresview Villa • AMP 600 Riverview Terrace 	No	Reflects existing designations from HUD for Mixed Population (Elderly/Disabled) developments
4-III.B	HACSA has designated elderly/non-elderly disabled designated housing at this time.	Homes for Good has no properties designated for elderly families or disabled families.	No	Corrects typo

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-III.E	HACSA will notify a family of their eligibility within 14 calendar days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.	<p>Homes for Good will notify a family of their eligibility within 14 calendar days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.</p> <p>Homes for Good will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program as a result of an emergency transfer from another Homes for Good program.</p>	No	Compliance with new VAWA guidance
4-III.E	<p>Upon making an eligibility determination, the PHA must provide the family a notice of VAWA rights as noted in the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act of 2013, and as outlined in 16-VII.C. The notice and self-certification form must accompany the written notification of eligibility determination. This notice must be provided in both of the following instances: (1) when a family is notified of its eligibility; or (2) when a family is notified of its ineligibility.</p>	<p>The PHA must provide the family a notice of VAWA rights (form HUD-5380) as well as the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act of 2013, and as outlined in 16-VII.C. at the time the applicant is provided assistance or at the time the applicant is denied assistance. This notice must be provided in both of the following instances: (1) when a family actually begins receiving assistance (lease execution); or (2) when a family is notified of its ineligibility.</p>	Yes	Compliance with new VAWA guidance

Section	Previous Policy			Proposed Policy			Required Change	Impact																																				
5-I.B	Foster children will be included in determining unit size.			<p>Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.</p> <p>Foster children will be included in determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on Homes for Good’s occupancy standards.</p> <p>Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.</p> <p>Children in the process of being adopted will be considered when determining unit size.</p> <p>Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.</p>			No	Added Clarity																																				
5-I-B	<table border="1" data-bbox="323 1057 892 1422"> <thead> <tr> <th data-bbox="323 1057 508 1175">BEDROOM SIZE</th> <th data-bbox="508 1057 688 1175">MINIMUM NUMBER OF PERSONS</th> <th data-bbox="688 1057 892 1175">MAXIMUM NUMBER OF PERSONS</th> </tr> </thead> <tbody> <tr> <td data-bbox="323 1175 508 1224">0</td> <td data-bbox="508 1175 688 1224">1</td> <td data-bbox="688 1175 892 1224">1</td> </tr> <tr> <td data-bbox="323 1224 508 1273">1</td> <td data-bbox="508 1224 688 1273">1</td> <td data-bbox="688 1224 892 1273">2</td> </tr> <tr> <td data-bbox="323 1273 508 1321">2</td> <td data-bbox="508 1273 688 1321">2</td> <td data-bbox="688 1273 892 1321">4</td> </tr> <tr> <td data-bbox="323 1321 508 1370">3</td> <td data-bbox="508 1321 688 1370">3</td> <td data-bbox="688 1321 892 1370">6</td> </tr> <tr> <td data-bbox="323 1370 508 1419">4</td> <td data-bbox="508 1370 688 1419">4</td> <td data-bbox="688 1370 892 1419">8</td> </tr> </tbody> </table>			BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS	0	1	1	1	1	2	2	2	4	3	3	6	4	4	8	<table border="1" data-bbox="934 1057 1503 1484"> <thead> <tr> <th data-bbox="934 1057 1119 1159">BEDROOM SIZE</th> <th data-bbox="1119 1057 1304 1159">MINIMUM NUMBER OF PERSONS</th> <th data-bbox="1304 1057 1503 1159">MAXIMUM NUMBER OF PERSONS</th> </tr> </thead> <tbody> <tr> <td data-bbox="934 1159 1119 1289">Small 1-Bedroom Units at Veneta Villa</td> <td data-bbox="1119 1159 1304 1289">1</td> <td data-bbox="1304 1159 1503 1289">2</td> </tr> <tr> <td data-bbox="934 1289 1119 1338">1</td> <td data-bbox="1119 1289 1304 1338">1</td> <td data-bbox="1304 1289 1503 1338">3</td> </tr> <tr> <td data-bbox="934 1338 1119 1386">2</td> <td data-bbox="1119 1338 1304 1386">2</td> <td data-bbox="1304 1338 1503 1386">5</td> </tr> <tr> <td data-bbox="934 1386 1119 1435">3</td> <td data-bbox="1119 1386 1304 1435">3</td> <td data-bbox="1304 1386 1503 1435">7</td> </tr> <tr> <td data-bbox="934 1435 1119 1484">4</td> <td data-bbox="1119 1435 1304 1484">4</td> <td data-bbox="1304 1435 1503 1484">9</td> </tr> </tbody> </table>			BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS	Small 1-Bedroom Units at Veneta Villa	1	2	1	1	3	2	2	5	3	3	7	4	4	9	No	Added Clarity, compliance with guidance from Fair Housing Council of Oregon
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5-II.C	Offers made by telephone will be confirmed by letter. Offers made by mail will be given three additional days.	Offers made solely by mail will be given three additional days for mailing time .	No	Added Clarity
6-I.C	When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the reexamination interview date.	When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the date of receipt by Homes for Good .	No	Added Clarity
6-III.D	Revised public housing maximum rents will be applied to a family's rent calculation at the first annual reexamination after the revision is adopted.	Revised public housing flat rents will be applied to a family's rent calculation at the first annual or interim reexamination after the revision is adopted.	No	Added Clarity
6-II.E	The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.	The cost of animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.	No	Added Clarity
7-I.B	Any documents used for verification must be the original or valid copy and generally must be dated within 60 days of the date they are provided to HACSA. The documents must not be damaged, altered or in any way illegible.	Any documents used for verification must be the original or valid copy and generally must be dated within 60 days of the date requested by Homes for Good. The documents must not be damaged, altered or in any way illegible.	No	Added Clarity
7-II.C	Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify and calculate earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.	Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.	No	Added Clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
7-II.H	<p>HACSA will require verification of VAWA preference or the need for reasonable accommodation preference, for families residing in Section 8 properties managed by HACSA.</p> <p>Verification of VAWA may include, but not be limited to, any of the resources listed on form HUD-50066.</p> <p>Verification of need for reasonable accommodation will be pursuant to HACSA's reasonable accommodation policy.</p>	<p>Homes for Good offers a preference for victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by HACSA, (currently Abbie Lane, Fourteen Pines, and Village Oaks) or holding a Housing Choice Voucher issued by Homes for Good, whose situation requires moving out of the current unit – as described in Section 4-III.B. To verify that applicants qualify for the preference, Homes for Good will follow documentation requirements outlined in Section 16-VII.D.</p> <p>Homes for Good also offers a preference for persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by Homes for Good, or holding a Housing Choice Voucher issued by Homes for Good, who cannot be reasonably accommodated in those properties. To verify that applicants qualify for the preference, Homes for Good will follow documentation requirements outlined in Homes for Good's reasonable accommodation policy.</p>	No	Clarifies verification process for preferences.
8-I.A	PHAs must adopt smoke-free policies, which must be implemented no later than July 18 , 2018. A model policy is attached as Exhibit 8-1.	PHAs must adopt smoke-free policies, which must be implemented no later than July 30 , 2018. The policy is attached as Exhibit 8-1.	Yes	None.

Section	Previous Policy	Proposed Policy	Required Change	Impact
8-I.D	If, for any reason, any member of the household ceases to reside in the unit, the lease may be amended by drawing a line through the person's name. The head of household and HACSA will be required to initial and date the change.	If, for any reason, any member of the household ceases to reside in the unit, the lease may be amended by drawing a line through the person's name, or by a lease amendment. The head of household and Homes for Good will be required to initial and date the change.	No	More consistent paperwork
8-I.D	If a new household member is a minor approved by HACSA to reside in the unit, the person's name and birth date will be added to the existing lease. The head of household and HACSA will be required to sign and date the change.	If a new household member is a minor approved by Homes for Good to reside in the unit, the person's name and birth date will be added to the existing lease through an amendment. The head of household, all adults, and Homes for Good will be required to sign and date the change. When a minor turns 18 the family will need to sign a new lease.	No	More consistent paperwork. Ensures new residents and household members who are turning 18 have seen and had a chance to read the lease.
8-I.E	If the resident transfers to another unit, HACSA will transfer the security deposit to the new unit. If the security deposit in the new unit is higher, the tenant will be required to pay the difference between the "old" and "new" unit. The tenant will be billed for any maintenance or other charges due for the "old" unit.	If the resident transfers to another unit, Homes for Good will transfer the security deposit to the new unit, including transfers due to RAD. If the security deposit in the new unit is higher, the tenant will be required to pay the difference between the "old" and "new" unit. The tenant will be billed for any maintenance or other charges due for the "old" unit.	No	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
8-I.F	-N/A-	<p>Homes for Good may grant requests for relief from surcharges from excess utility consumption of Homes for Good-furnished utilities as a reasonable accommodation where Homes for Good deems an exception is appropriate to meet the needs of elderly, ill, or disabled residents. In determining whether to grant this request, Homes for Good will consider special factors affecting utility usage that are not within the control of the resident, such as the need for medical equipment. Residents may request relief in accordance with Section 2-II.C. of this ACOP. Homes for Good will process such requests in accordance with Section 2-II.E. of this ACOP.</p> <p>Notice of the availability of procedures for requesting relief (including the Homes for Good representative with whom initial contact may be made by the resident) and the Homes for Good criteria for granting requests, will be included in each notice to residents of changes in utility allowances or surcharges as well as to new residents as part of the lease orientation.</p>	No	None at this time – because Homes for Good does not charge for excess utilities. This change is recommended by Nan McKay.
8-II.B	HACSA will inspect all occupied units annually using HUD’s Uniform Physical Condition Standards (UPCS).	Homes for Good or a contractor will inspect all occupied units annually using HUD’s Uniform Physical Condition Standards (UPCS).	No	Added clarity
8-II.C	Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for HACSA to enter the unit.	Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for Homes for Good to enter the unit within 7 days from the date of request.	No	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
8-II.C	If no one is at home, the inspector will enter the unit, conduct the inspection and leave the resident a copy of the inspection report.	If no one is at home for the preventative maintenance inspection , the inspector will enter the unit, conduct the inspection and leave the resident a copy of the inspection report. For other entries when a resident is not home, Homes for Good will leave a notice of the date, time, and purpose of entry.	No	Added clarity
9-III.C	HACSA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's rent will change as a result of the increase.	Homes for Good will conduct an interim reexamination if the change is from a new source of income, or if the family has received an interim reexamination since their last annual that resulted in a decrease in rent. Homes for Good will also conduct interim reexaminations for families that qualify for the earned income disallowance (EID), but only when the EID family's rent will change as a result of the increase.	No	Returns to a policy of completing interims that increase rent
9-III.C	If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, HACSA 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.	If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, Homes for Good will conduct an interim reexamination if the change is from a new source of income, or if the family has received an interim reexamination since their last annual that resulted in a decrease in rent. Otherwise, Homes for Good 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.	No	Returns to a policy of completing interims that increase rent.

Section	Previous Policy	Proposed Policy	Required Change	Impact
10-II.B.	Pet authorization will be renewed annually and will be coordinated with the annual reexamination date.	-N/A-	No	Reduced paperwork burden
10-II.B.	Residents who have been approved to have a pet must enter into a pet agreement with HACSA, or the approval of the pet will be withdrawn.	Residents who have been approved to have a pet must enter into a pet agreement with Homes for Good prior to bringing the pet onto the premises , or the approval of the pet will be withdrawn.	No	Added clarity
10-II.C	-N/A-	PHAs may not require pet owners to obtain or carry liability insurance. PHAs may not require that cats be declawed.	Yes	Compliance with new guidance
10-II.D	The following animals are not considered common household pets: Reptiles Insects Arachnids Wild animals or feral animals Pot-bellied pigs Animals used for commercial breeding	The following animals are not considered common household pets: Reptiles Insects Arachnids Wild animals or feral animals Pot-bellied pigs Ferrets Hedgehogs Sugar Gliders Animals used for commercial breeding	No	Added Clarity
10-II.D	Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and annually, in conjunction with the resident's annual reexamination.	Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration.	No	Reduced paperwork burden

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10-II.D	Residents are not permitted to exercise pets or permit pets to deposit waste on project premises outside of the areas designated for such purposes.	-N/A-	No	Added clarity; there are no designated pet areas.
10-II.D	The designated responsible party must not be another resident of HACSA-managed housing.	The designated responsible party must not be another resident of Homes for Good-managed housing. The responsible party's information will be updated at the time of the annual recertification.	No	Added Clarity
10-II.D	Pets that are not owned by a resident are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals or wildlife.	Pets that are not owned by a resident are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals or wildlife. Residents may however have bird feeders.	No	Added clarity
11-I.C	Approximately 60 days prior to the end of the lease term, HACSA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement.	As the part of the annual recertification process, Homes for Good will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement.	No	Added Clarity

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<p>12-I.B</p>	<p>For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may be established through documentation outlined in section 16-VII.D, or by any proof accepted by the PHA.</p> <p>The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. The PHA will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available.</p>	<p>For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may be established through documentation outlined in section 16-VII.D. In order to request the emergency transfer, the requestor must submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP), although, Homes for Good may waive this requirement in order to expedite the transfer process.</p> <p>The PHA will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. The PHA will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. Homes for Good defines immediately available as a vacant unit, that is ready for move-in within a reasonable period of time, not to exceed 60 days.</p>	<p>Yes</p>	<p>Compliance with new VAWA guidance</p>
<p>12-I.C</p>	<p>-N/A-</p>	<p>If the emergency transfer is necessary to protect a victim of domestic violence, dating violence, sexual assault, or stalking, Homes for Good will follow procedures outlined in Exhibit 16-4.</p>	<p>Yes</p>	<p>Compliance with new VAWA guidance</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
12-III.C	<p>Exceptions to the good record requirement may be made when it is to HACSA's advantage to make the transfer.</p> <p>Exceptions may also be made when HACSA determines that a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking and who provides documentation of abuse in accordance with section 16-VII.D of this ACOP.</p>	<p>Exceptions to the good record requirement may be made when it is to Homes for Good's advantage to make the transfer.</p> <p>Exceptions will also be made when Homes for Good determines that a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking and who provides documentation of abuse in accordance with section 16-VII.D of this ACOP. Tenants who are not in good standing may still request an emergency transfer under VAWA.</p>	Yes	Compliance with new VAWA guidance
12-III.F	-N/A-	<p>In order to request the emergency transfer under VAWA, the resident will be required to submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP). Homes for Good may, on a case-by-case basis, waive this requirement and accept a verbal request in order to expedite the transfer process. If Homes for Good accepts an individual's statement, Homes for Good will document acceptance of the statement in the individual's file in accordance with 16-VII.D. of this ACOP. Transfer requests under VAWA will be processed in accordance with the Homes for Good Emergency Transfer Plan (Exhibit 16-3).</p>	No	Compliance with new VAWA guidance
12-IV.B.	<p>Transfers will be processed in the following order:</p> <p>1. Emergency transfers (hazardous maintenance conditions)</p>	<p>Transfers will be processed in the following order:</p> <p>1. Emergency transfers (hazardous maintenance conditions, VAWA)</p>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
13-III.F.	VAWA provides that no person may deny assistance, tenancy, or occupancy rights to public housing to a tenant solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, if the tenant or affiliated individual is the victim or threatened victim of such domestic violence, dating violence, sexual assault, or stalking [FR Notice 8/6/13].	VAWA provides that no person may deny assistance, tenancy, or occupancy rights to public housing to a tenant on the basis or as a direct result of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking that is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, if the tenant or affiliated individual is the victim or threatened victim of such domestic violence, dating violence, sexual assault, or stalking [FR Notice 8/6/13].	Yes	Compliance with new VAWA guidance
13-III.F	-N/A-	In order to demonstrate an actual and imminent threat, the PHA must have objective evidence of words, gestures, actions, or other indicators.	Yes	Compliance with new VAWA guidance
13-III.F	<p>In determining whether a public housing tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:</p> <ul style="list-style-type: none"> Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault, or stalking Whether the threat is a physical danger beyond a speculative threat Whether the threat is likely to happen within a short period of time 	<p>In determining whether a public housing tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:</p> <ul style="list-style-type: none"> Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault, or stalking Whether the threat is a physical danger beyond a speculative threat Whether the threat is likely to happen within an immediate time frame 	No	Added clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
13-III.F	-N/A-	However, perpetrators should be given no more than 30 days' notice of termination in most cases. The PHA must not initiate eviction procedures against ineligible remaining family members until 30 days after the lease bifurcation [Notice PIH 2017-08].	Yes	Compliance with new VAWA guidance
13-IV.D	All notices of lease termination will include information about the protection against termination provided by the Violence against Women Reauthorization Act of 2013 (VAWA) for victims of domestic violence, dating violence, sexual assault, or stalking (see section 16 VII.C). The PHA will also include a copy of the form HUD-5382 and a notice of VAWA rights to accompany the termination notice. Any tenant who claims that the cause for termination involves (a) criminal acts of physical violence against family members or others or (b) incidents of domestic violence, dating violence, sexual assault, or stalking of which the tenant or affiliated individual of the tenant is the victim will be given the opportunity to provide documentation in accordance with the policies in sections 13 III.F and 16-VII.D.	All notices of lease termination will include a copy of the forms HUD-5382 and HUD-5380 to accompany the termination notice. Any tenant who claims that the cause for termination involves domestic violence, dating violence, sexual assault, or stalking of which the tenant or affiliated individual of the tenant is the victim will be given the opportunity to provide documentation in accordance with the policies in sections 13 III.F and 16-VII.D.	Yes	Compliance with new VAWA guidance
14 – cost of copying	cost of \$5.00 initially and \$.05 per page.	cost of \$.25 per page	No	Simplified policy, aligns with Section 8
14-II.A	HACSA will conduct any recording of the informal hearing.	If the family chooses to record the hearing, HACSA will also record the hearing.	No	Added Clarity

Section	Previous Policy	Proposed Policy	Required Change	Impact
14-III.D	HACSA will accept requests for an informal settlement of a grievance either orally or in writing, to the HACSA office within 5 working days of the HACSA nonpayment of rent notice, 5 working days for lease termination notice, and 14 calendar days for any other grievance .	HACSA will accept requests for an informal settlement of a grievance either orally or in writing, to the HACSA office within 5 working days of the HACSA nonpayment of rent notice, 5 working days (or prior to the termination date) for lease termination notice, and 14 calendar days for any other grievable event .	No	Added Clarity
14-III.G	If the complainant would like HACSA to record the proceedings by audiotape, the request must be made to HACSA by 12:00 p.m. on the business day prior to the hearing. HACSA will record the proceedings.	If the complainant would like HACSA to record the proceedings by audiotape, the request must be made to HACSA by 12:00 p.m. on the business day prior to the hearing. HACSA will record the proceedings if the complainant records .	No	Added Clarity
16-II.B	Alternatively, the PHA may set flat rents at no less than 80 percent of the applicable small area FMR (SAFMR) for metropolitan areas, or 80 percent of the applicable unadjusted rents for nonmetropolitan areas.	Alternatively, the PHA may set flat rents at no less than 80 percent of the applicable small area FMR (SAFMR) for metropolitan areas, or 100 percent of the applicable unadjusted rents for nonmetropolitan areas.	Yes	Compliance with new Flat Rent guidance
16-II.B	The 2015 Appropriations Act permits PHAs to request an exception flat rent that is lower than either 80 percent of the FMR or SAFMR/unadjusted rent if the PHA can demonstrate that these FMRs do not reflect the market value of a particular property or unit.	The 2015 Appropriations Act permits PHAs to request an exception flat rent that is lower than either 80 percent of the FMR or SAFMR or 100 percent of the unadjusted rent if the PHA can demonstrate that these FMRs do not reflect the market value of a particular property or unit.	Yes	Compliance with new Flat Rent guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-II.B	<p>In determining flat rents, PHAs must consider the following:</p> <ul style="list-style-type: none"> • Location • Quality • Unit size • Unit type • Age of property • Amenities at the property and in immediate neighborhood • Housing services provided • Maintenance provided by the PHA • Utilities provided by the PHA 	<p>In determining flat rents, PHAs must consider the following:</p> <ul style="list-style-type: none"> • Location • Quality • Unit size • Unit type • Age of the unit • Amenities at the property and in immediate neighborhood • Housing services provided • Maintenance provided by the PHA • Utilities provided by the PHA and/or landlord for (comparable units in the market study) • The PHA must provide a corresponding key explaining the calculations used for determining the valuation for each factor. 	Yes	Compliance with new Flat Rent Guidance
16-II.B	<p>PHAs must receive written HUD approval before implementing exception flat rents. PHAs that use exception flat rents must conduct a new market analysis, and obtain HUD approval, annually.</p> <p>PHAs are now required to apply a utility allowance to flat rents. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.</p>	<p>PHAs must receive written HUD approval before implementing exception flat rents. PHAs with a previously approved flat rent exception request may submit a written request to extend the approved flat rents for up to two additional years, provided local market conditions remain unchanged. Detailed information on how to request exception flat rents can be found in Notice PIH 2017-23.</p> <p>PHAs are now required to apply a utility allowance to flat rents as necessary. Flat rents set at 80 percent of the FMR must be reduced by the amount of the unit's utility allowance, if any.</p>	Yes	Compliance with new Flat Rent guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-II.B	<p>No later than 90 days after HUD publishes new annual FMRs/SAFMRs/unadjusted rent, PHAs must revise flat rents as necessary based changes to the FMR/SAFMR/unadjusted rent. The PHA must offer changes to the flat rent to all new admissions and to existing families at the next annual rent option.</p> <p>If</p>	<p>No later than 90 days after the effective date of the new annual FMRs/SAFMRs/unadjusted rent, PHAs must implement new flat rents as necessary based changes to the FMR/SAFMR/unadjusted rent or request an exception.</p>	Yes	Compliance with new Flat Rent guidance
16-V.B	-N/A-	<p>The PHA must keep confidential records of all emergency transfer requested under the PHA’s Emergency Transfer Plan, and the outcomes of such requests, and retain the records for a period of three years, or for a period of time as specific in program regulations [24 CFR 5.2002(e)(12)].</p>	Yes	Compliance with new VAWA guidance
16-V.B	<p>During the term of each public housing tenancy, and for at least four years thereafter, the PHA will keep all documents related to a family’s eligibility, tenancy, and termination.</p>	<p>The PHA will keep the last three years of the Form HUD-50058 and supporting documentation, and for at least three years after end of participation all documents related to a family’s eligibility, tenancy, and termination.</p>	Yes	Compliance with new record-retention guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-V.B	<p>In addition, the PHA will keep the following records for at least four years:</p> <ul style="list-style-type: none"> • An application from each ineligible family and notice that the applicant is not eligible • Lead-based paint records as required by 24 CFR 35, Subpart B • Documentation supporting the establishment of flat rents and the public housing maximum rent • Documentation supporting the establishment of utility allowances and surcharges • Documentation related to PHAS • Accounts and other records supporting PHA budget and financial statements for the program • Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule • Other records as determined by the PHA or as required by HUD 	<p>In addition, the PHA will keep the following records for at least three years:</p> <ul style="list-style-type: none"> • An application from each ineligible family and notice that the applicant is not eligible • Lead-based paint records as required by 24 CFR 35, Subpart B • Documentation supporting the establishment of flat rents • Documentation supporting the establishment of utility allowances and surcharges • Documentation related to PHAS • Accounts and other records supporting PHA budget and financial statements for the program • Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule • Confidential records of all emergency transfers related to VAWA requested under the PHA's Emergency Transfer Plan and the outcomes of such requests • Other records as determined by the PHA or as required by HUD 	Yes	Compliance with new record-retention guidance
16-VI	Environmental Intervention Blood Lead Level	Elevated Blood Lead Level (EBLL)	Yes	Compliance with new Lead guidance
16-VI.A	HACSA will provide written notice of each known case of a child with an EBLL to the HUD field office within five business days of receiving the information.	Homes for Good will provide written notice of each known case of a child with an EBLL to the HUD field office, and to HUD's Office of Lead Hazard Control (OLHCHH) , within five business days of receiving the information.	Yes	Compliance with new Lead guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-VII.C	Whenever HACSA has reason to suspect that providing information about VAWA to a public housing tenant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim.	<p>Whenever Homes for Good has reason to suspect that providing information about VAWA to a public housing tenant 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, Homes for Good may decide not to send mail regarding VAWA protections to the victim's unit if Homes for Good believes the perpetrator may have access to the victim's mail, unless requested by the victim.</p> <p>When discussing VAWA with the victim, Homes for Good will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room.</p> <p>The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.</p>	No	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-VII.D	<p>The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:</p> <p>(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.</p>	<p>The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:</p> <p>(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.</p>	Yes	Compliance with new VAWA guidance
16-VII.D	<p>HACSA may, at its discretion, extend the deadline for an additional 14 calendar days. If an extension is granted, HACSA will provide the extension in writing.</p>	<p>Homes for Good may, at its discretion, extend the deadline for an additional 14 calendar days. In determining whether to extend the deadline, Homes for Good will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, 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. If an extension is granted, Homes for Good will provide the extension in writing.</p> <p>Once the victim provides documentation, Homes for Good will acknowledge receipt of the documentation within 14 calendar days.</p>	Yes	Compliance with new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-VII.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). 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. The PHA must honor any court orders issued to protect the victim or to address the distribution of property. 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 new VAWA guidance

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-VII.D	-N/A-	<p>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 calendar days from the date of the request to provide such documentation.</p> <p>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.</p>	Yes	Compliance with new VAWA guidance
16-VII.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 new VAWA guidance
16-VII.D	If HACSA may accepts an individual's statement or other corroborating evidence of domestic violence, dating violence, sexual assault, or stalking, HACSA will document acceptance of the statement or evidence in the individual's file.	If Homes for Good accepts an individual's statement or other corroborating evidence (as provided by the victim) of domestic violence, dating violence, sexual assault, or stalking, Homes for Good will document acceptance of the statement or evidence in the individual's file.	No	Correct typo and provide added clarity