

## **Executive Summary of Administrative Plan Changes**

### **CHAPTER 1 OVERVIEW OF THE PROGRAM AND PLAN**

- Amended policy to review and update the Administrative Plan at least once a year or when needed to ensure staff consistency to program applicants and participants.

### **CHAPTER 2 FAIR HOUSING AND EQUAL OPPORTUNITY**

- Added policy to include protected classes prohibited from discrimination in housing by California state law consistent with SCHA practices.
- Included policy to describe how the SCHA will address housing discrimination complaints against an owner as required by HUD regulation.
- Added policy of steps to ensure persons with disabilities know their right to have full access to the SCHA's programs and services consistent with SCHA practices.
- Updated policy for responding to Reasonable Accommodation requests including specific dates.
- Added a Section 504 of the Rehabilitation Act Grievance Policy.
- Revised the Oral Interpretation policy for persons with Limited English Proficiency (LEP).
- Revised policy for a written implementation plan to meet the needs of the LEP population.

### **CHAPTER 3 ELIGIBILITY**

- Clarified policy on family break up and continued assistance consistent with SCHA practices.
- Revised qualification to be considered *Head of household* for purposes of determining income eligibility and rent.
- Definition of *Spouse* as the marriage partner of the head of household added consistent with HUD regulation.
- Clarified and added policy to address when absent students and other members are considered household members or permanently absent consistent with SCHA practices.
- Updated policy for approval of the need for a Live-in Aide consistent with SCHA practices.
- Added policy regarding signed declaration of U.S. Citizen or National citizenship status consistent with SCHA practices.
- Added language to policy regarding Ineligible Families and delay of assistance pending USCIS appeal process consistent with SCHA practices.
- Added to the criteria to consider a student "independent" from his or her parents (the parents' income will not be considered when determining the student's eligibility).
- The criteria to be a person with disabilities as a vulnerable youth was added in conformance with HUD regulation.
- Added policy for students applying for assistance on his/her own, apart from his/her parents in conformance with HUD regulation.
- Added policy regarding admitting a family previously evicted from federally-assisted housing within the past 3 years that has completed a court-ordered or other SCHA approved supervised drug rehabilitation program or the person no longer lives in the household.
- Defines "reasonable time period" to deny assistance for drug, violent or and other criminal activity as activity that occurred within 5 years consistent with SCHA practices.
- Specified how SCHA will perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program consistent with SCHA practices.

- Clarified SCHA policy on Screening for Eligibility as a Tenant consistent with SCHA practices.
- Describe how SCHA will consider relevant circumstances when deciding whether to deny assistance based on a family's past history consistent with SCHA practices.
- Added ability to permit the family to exclude the culpable family members as a condition of eligibility.
- Added policies regarding notice of eligibility or denial including timeline and specific policies for sex offenders or other criminal activity.
- Added policy regarding denial of assistance for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.

## **CHAPTER 4**

### **APPLICATIONS, WAITING LIST AND TENANT SELECTION**

- Updated policy for accepting applications to an online process with paper applications available as a reasonable accommodation. The new online application process includes a providing a list of advocates available to help applicants complete and submit the application.
- Added process when the SCHA determines an applicant is not eligible consistent with SCHA practices.
- Updated policy regarding placement on the waiting list to be a random lottery selection process and according to any preference(s).
- Added policy that HCV waiting list will not be merged with any other program SCHA operates.
- Clarified language in policy regarding closing the waiting list when the estimated waiting period reaches 24 months.
- Clarified announcement and notice when reopening the waitlist.
- Minor updates regarding purging the waiting list were made.
- Added Veterans Affairs Supportive Housing (VASH) vouchers as a targeted funding type administered.
- Local Preference system updated:
  - Added *Terminated from HCV Program Due to Insufficient Funding*. These families would be placed on the waiting list even if the waiting list is closed and will be served first as soon as a voucher becomes available.
  - Clarified *Displaced by Local Government Action*. These families would be placed on the waiting list even if the waiting list is closed and would be assisted first after families that have been terminated due to insufficient funding, if any.
  - Working preference updated to be automatically awarded to elderly and disabled families in accordance with HUD regulation and consistent with SCHA practices.
  - Except for *Terminated from HCV Program Due to Insufficient Funding*, the preference ranking system remains unchanged. A table has been added to the show ranking system by points.
- Added policy regarding order of selection to be consistent with HUD regulation, updated preference system, and random lottery system.
- Clarified eligibility notice and removal from waiting list due to no show/no reschedule and return mail consistent with SCHA practices.
- Updated Eligibility Appointment section to remove staff level administrative processes.

## **CHAPTER 5**

### **BRIEFINGS AND VOUCHER ISSUANCE**

- Updated Notification and Attendance consistent with SCHA practices.
- Added to materials to be included in the program briefing packets.
- Update policy regarding serious or repeated violation of the lease consistent with HUD regulation and SCHA practices.
- Added timeline for the family to notify the SCHA if any family member no longer lives in the unit.

- Modified subsidy standard for the purpose of calculating the amount of rent subsidy provided to add exceptions to the two persons per bedroom/sleeping room.
- Removed staff level administrative processes and clarified policy regarding exceptions to subsidy standard as a reasonable accommodation.
- Added policies on voucher issuance consistent with SCHAs practices.
- Revised policy on extending voucher term (total of 120 days) with policy on when an additional 60 days may be granted.
- Clarified policy on voucher termination and requirement for family to reapply for assistance.

## **CHAPTER 6**

### **INCOME AND SUBSIDY DETERMINATIONS**

- Updated policies on verification of Temporarily Absent Family Members.
- Updated policy on verification of Family Members Permanently Confined for Medical Reasons.
- Changed language defining Temporary, Nonrecurring, or Sporadic Income.
- Added policy for how income from HUD-Funded Training Programs is counted.
- Added policy regarding interims during the 48-month eligibility period of the Earned Income Disallowance.
- Added policy for participants subject to the “Revised Calculation Method” for the Earned Income Disallowance.
- The revised its policy on calculating the average passbook rate applied to assets.
- Consideration of assets disposed of as part of a separation or divorce settlement policy added.
- Policy for determining equity in real property or other capital investments added.
- Added policy to use 5% of the market value of the home to calculate expenses to convert real property to cash.
- Minor changes to Periodic Payments section made.
- Policy for study time allowed for child care expenses that enable a family member to go to school added.
- Minimum rent policy changed to zero.
- Revised utility reimbursement policy to be paid to the family on a monthly basis.
- Updated policy regarding Financial Hardship Affecting Minimum Rent (although they do not apply due to zero minimum rent policy).
- Changed policy that decreased payment standards will not be applied to a family during the term of a HAP contract (would be applied at new admission, or if a new lease/HAP contract are entered into or when the family moves).

## **CHAPTER 7**

### **VERIFICATION**

- Added policy that Income Verification Tool will be used in conformance with HUD requirements.
- Included policy on the use of HUD’s Upfront Income Verification system consistent with SCHAs practices.
- Updated verification policies:
  - tenant provided paystubs,
  - sending third-party verification forms,
  - oral third-party verification,
  - when third-party verification is not required,
  - acceptance of family’s declaration of assets valued at \$5,000 or less,
  - self-certification acceptance for income and/or assets.
- Policies regarding social security number information added.
- Minor changes to policies regarding verification of family relationships.
- Added to verification of independent student verification policy.

- Updated policy for documenting disability for family members who do not receive disability benefits from SSA to have a knowledgeable professional certify the family member meets HUD's definition of a disability.
- Added policy to verify preferences for the *Terminated for Insufficient Funding* preference.
- Updated *Working Family* preference definition and added that elderly and disabled households automatically qualify for this preference (instead of listing as separate preferences).
- Added policy about family providing three paystubs to verify wages.
- Updated policy regarding Business and Self Employment verification.
- Updated policy to accept family self-certification of fully excluded sources of income.
- Updated policy on verification of medical expenses.
- Added policy regarding the requirement to verify that medical expenses are not paid or reimbursed by any source.

## **CHAPTER 8**

### **HOUSING QUALITY STANDARDS AND RENT REASONABLENESS DETERMINATIONS**

- Added a policy for the owner to submit any restoration agreement to the SCHA.
- Added specific requirements regarding heating system capabilities, walls, windows, doors, floors, toilets, and security.
- Updated language regarding what is considered a Life Threatening Condition.
- Added/Updated that no fee will be charged for reinspections, policy on initial inspections, and timeline for conducting initial inspections consistent with SCHA practices.
- Updated policy regarding timing of utilities being available.
- Updated policy to conduct biennial inspections unless a unit fails a biennial inspection, HAP was abated for any time period, or the family was sent a termination notice due to failure to repair violations. In those cases, the unit will be inspected annually for the following two years.
- Added policy on timing of scheduling special inspections for non-life threatening conditions.
- Added language on extension of repairs to allow SCHA flexibility and to clarify reinspections.
- Added timeline for reinspection of units where HAP is abated and timelines for termination of HAP contract if repairs are not made.
- Added policy regarding rent determinations in cases of rent concessions.

## **CHAPTER 9**

### **GENERAL LEASING POLICIES**

- Updated its policy on screening for suitability as a tenant.
- Added policy that a standard or model lease document is not provided consistent with SCHA practices.
- Added policy for non-lease agreements that are allowable.
- Added policy that SCHA does not review leases for compliance with state/local law consistent with SCHA practices (security deposit amounts are reviewed).
- Added timeline for tenancy approval consistent with SCHA practices.
- Added Violence Against Women Act language consistent with HUD regulations.

## **CHAPTER 10**

### **MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY**

- Added Violence Against Women Act language consistent with HUD regulations regarding allowable moves.
- Updated policy on denial of moves due to insufficient funding.
- Added/Updated policy giving SCHA discretion to deny a move if the SCHA has grounds for denying or terminating a family's assistance and restriction on moves consistent with SCHA practices.

- Added timeline to approve moves.
- Added policy that an annual reexamination may be performed when a family moves consistent with SCHA practices.
- Added policy regarding paying HAP when the sole member of the household passes away consistent with HUD regulations.
- Added policy for zero HAP family's to receive a voucher to move, but no HAP contract will be entered into if no HAP will be paid at the new unit consistent with SCHA practices.
- Updated policy on allowable moves under portability for applicant and participant families.
- Policy on briefings for moves under portability updated consistent with HUD regulations.
- Revised policy on voucher issuance and term under portability.
- Added policy regarding contact and notice to a receiving or initial PHA.
- Added policy regarding honoring late portability billings received consistent with SCHA practices.
- Updated policy that portability billings will be paid by direct deposit whenever possible.
- Added policy to bill for maximum amount of administrative fees allowed, unless a different amount is negotiated, consistent with SCHA practices.
- Added timeline for notification of absorbing a portability family.

## **CHAPTER 11 RE-EXAMINATIONS**

- Updated policy for conducting annual reexamination to occur by mail unless a family does not provide the information required, or upon family request for an in-person interview.
- Added policy that SCHA will ask whether the tenant or any household member is subject to a lifetime sex offender registration at the annual reexamination, consistent with SCHA practices and HUD guidance.
- Updated policy on New Family and Household Members Requiring Approval to clarify criteria and add timeline for SCHA to make a determination.
- Updated Departure of a Family or Household Member section to remove staff level administrative processes.
- Revised policy for reporting income changes to more than \$500 increase in a month except households with the Earned Income Disallowance that must report all changes.
- Clarified policy about reporting that is not required. Increases will be documented in the file, all decreases will be processed, and the family can report any changes at any time.
- Made clarifications to interim processing and effective dates consistent with SCHA practices.

## **CHAPTER 12 TERMINATION OF ASSISTANCE AND TENANCY**

- Removed staff level administrative processes and clarified policy regarding families no longer requiring assistance.
- Added timeline for families who fail to Disclose and Document Social Security Numbers.
- Clarified policy regarding termination for Use of Illegal Drugs and Alcohol Abuse and Drug-Related and Violent Criminal Activity and Other Authorized Reasons for Termination of Assistance .
- Added policy that a family's assistance will be terminated if the family is absent from the unit for more than 180 consecutive calendar days.
- Added policy that, special purpose (currently VASH) will be issued vouchers first when vouchers become available after the SCHA decides to stop issuing vouchers as a result of a funding shortfall and that special purpose and tenant protection vouchers will be terminated last due to funding shortfall, as required by HUD.
- Clarified policy on requirements when a household member who participated in or was responsible for an offense no longer resides in the unit in lieu of termination.
- Added policy on repayment of debt in lieu of termination.

- Clarification of consideration of circumstances included consistent with SCHAs practices.
- Updated Violence Against Women Act language consistent with HUD regulations.
- Exhibit 12-1, Family Obligations includes clarification of SCHAs policies.

## **CHAPTER 13 OWNERS**

- Changed “landlord” to “owner” throughout.
- A few minor clarifying policy updates only.

## **CHAPTER 14 PROGRAM INTEGRITY**

- Added to policy on techniques to employ to ensure that both errors and intentional program abuse are rare consistent with SCHAs practices.
- Defined preponderance of evidence when analyzing information during a program abuse investigation.
- Added considerations that will be made when determining remedies for program abuse.
- Added timeline for notices of findings and remedies.
- Added sexual and other harassment and retaliation as a prohibited owner actions consistent with HUD regulations.
- Listing of what is considered program abuse by SCHAs staff added.

## **CHAPTER 15 SPECIAL HOUSING TYPES**

- Updated policy to allow Shared Housing without need as a reasonable accommodation for persons with disabilities.
- Clarification of policy on termination and informal hearing procedures added consistent with SCHAs practices.

## **CHAPTER 16 PROGRAM ADMINISTRATION**

- Added policy regarding expenditure of any reserve administrative fees consistent with SCHAs practices.
- Added policy that comments can be submitted regarding schedules discussed in this chapter and that schedules will be retained for at least 3 years.
- Updated factors to consider when determining whether payment standards will be adjusted.
- Added policy to address requests for payment standards that exceed SCHAs authority as a reasonable accommodation.
- Modified informal review policy to provide only when required.
- Added specific timeline to schedule an informal review.
- Included information to be included in informal review decision and denial if applicant does not attend the review consistent with SCHAs practices.
- Included information to be included in informal hearing notice and specific timelines related to the informal hearing and pre-hearing right to discovery.
- Added policy on who will serve as hearing officer consistent with SCHAs practices.
- Minor changes made to attendance, evidence, and hearing consistent with SCHAs practices.
- Included policy on providing hearing decision consistent with SCHAs practices.
- Clarified process when SCHAs determines the hearing decision exceeded the authority of the hearing officer, the decision conflicted with or contradicted HUD regulations, requirements, or the decision was otherwise contrary to federal, state, or local laws consistent with SCHAs practices.

- Added specific timelines related to USCIS appeals process.
- Added policy that transcripts of audio type of hearing will not be provided.
- Clarified policy on debts owed by owner consistent with SCHA practices.
- Updated debts owed by family consistent with HUD regulations including: down payment requirements and hardship exemptions, execution of repayment agreements, late or missed payments, and threshold for not offering a repayment agreement due to program fraud or abuse.
- Added section on Section Eight Management Assessment Program consistent with HUD regulation (this is not a SCHA discretionary policy).
- Updated policy on discussion of family information consistent with SCHA practices.
- Included policy on security procedures for HUD's Enterprise Verification Information system consistent with SCHA practices.
- Added Part VII: Reporting and Record Keeping for Children with Elevated Blood Lead Level consistent with HUD regulations.
- Updated policies related to notification of rights under the Violence Against Women Act (VAWA) to: the public, program applicants and participants, and owners and managers consistent with HUD regulations.
- Added policy allowing SCHA to extend deadlines for receiving VAWA documentation.
- Added policy if conflicting VAWA documentation is received consistent with HUD regulations.
- Added policy regarding safety of the victim in cases of disclosure of information.