



100 West 13th Avenue, Eugene, OR 97401 • PH 541-682-3755 • FAX 541-682-3411

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KEY MODIFICATIONS TO THE HOMES FOR GOOD RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2024 EFFECTIVE DATE 10-1-2023 TO 9-30-2024

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

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**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-2023**

Section	Previous Policy	Proposed Policy	Required Change	Impact
Introduction	N/A	<p>HUD HCV Guidebook</p> <p>In November 2019 HUD began issuing a new version of the HCV Guidebook chapter-by-chapter. Unlike the previous version of the HCV Guidebook in which chapters were numbered, the new version of the guidebook includes chapter names, but no numbers. As the new version of the guidebook has not yet been fully released, and since the previous version of the guidebook contains guidance not found in the new version, the model policy cites both versions of the guidebook. Therefore, where the HCV Guidebook is cited in the model policy, the citation will make a distinction between the “old” and “new” versions of the guidebook. The “old” version of the guidebook will continue to be cited as <i>HCV GB</i> with a chapter/page reference (example: <i>HCV GB, p. 5-4</i>). If HUD has also released a new chapter on the same topic with information that either adds new information or updates existing information from the previous guidebook, the new guidebook will be cited as <i>New HCV GB</i> with a chapter title and page reference (example: <i>New HCV GB, Payment Standards, p. 11</i>).</p>	Yes	Indicates how the new and old Guidebook will be referenced through the Admin Plan

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Introduction	N/A	New HCV GB - Housing Choice Voucher Program Guidebook (7420.10G), Various dates of release	Yes	Provides explanation of added abbreviation in Admin Plan
3-I.F	If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes	If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, an IRS return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.	No	Provides flexibility on acceptable documents to verify dependents.
3-I.M	The person commits drug-related criminal activity or violent criminal activity; or	The person is convicted of criminal activity in violation of the PHA's criminal screening policies; or	No	Aligns live-in-aid screening policy with other screening policies
3-II.A	The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list.	The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list. The PHA will determine a family's income at time of receipt of the full application. Income changes that are effective after the receipt of the full application will not be used to determine income for the purpose of eligibility.	No	Provides clarity on when income will be determined for eligibility
3-III.B	In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. A record or records of arrest will not be used as the sole basis of determining	In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A record or records of arrest will not be used as the sole basis of determining reasonable cause.	No	Removes unnecessary sentence as Admin Plan already indicates that an arrest will not be used as sole basis of determining reasonable cause.

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	reasonable cause. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.	The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.		
3-III.C.	<p>If any household member is currently engaged in or has engaged in any of the following criminal activities, within the past three years, the family will be denied assistance. <i>Drug-related criminal activity</i>, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].</p> <p><i>Violent criminal activity</i>, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].</p> <p>Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity; or</p> <p>Criminal activity that may threaten the health or safety of property owners, management staff, and persons performing contract administration functions or other responsibilities on behalf of the PHA (including a PHA employee or a PHA contractor, subcontractor, or agent).</p> <p><i>Immediate vicinity</i> means within a three-block radius of the premises.</p> <p>Evidence of such criminal activity includes, but is not limited to:</p> <p>Any conviction for drug-related or violent criminal activity within the past three years.</p> <p>Records of arrests for drug-related or violent criminal activity within the past three years,</p>	<p>The PHA will not assess for other permitted reasons for denial of assistance.</p>	No	Reduces housing barriers for those who have a criminal conviction.

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	<p>although a record or records of arrest(s) will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity. A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity. In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.</p>			
3-III.C	<p>Per the alternative requirements listed in the <i>Federal Register</i> notice dated December 29, 2014, PHAs are no longer permitted to deny assistance to a family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [FR Notice 12/29/14].</p>	<p>PHAs are not permitted to deny assistance to a family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [24 CFR 984.101(d)].</p>	Yes	Provides updated language per the source of the regulation.
3-III.C	<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>	<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. When denying admission due to family debts as shown in HUD’s EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report. If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the</p>	No	Provides clear pathway for applicants to contest EIV findings.

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		PHA to support the family’s claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.		
4-II.C	The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to: <i>Register Guard</i>	The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to: <i>Local media publications</i>	No	Broadens what media publications we could publish in to fluctuate with how accessed a media publication is by the community.
4-II.F	The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA’s decision (see Chapter 16) [24 CFR 982.201(f)]. For applicant families that are on the same tenant-based voucher waitlist multiple times, if applicant family accepts subsidy then the family will be removed from the tenant- based voucher waitlist. The applicant family will not be removed from other PHA waitlists. For applicant families that are on the same project-based voucher waitlist (regardless of bedroom size), if applicant family accepts subsidy then the family will be removed from that project-based voucher waitlist (all bedroom sizes for which they were on). The applicant family will not be removed from other PHA waitlists.	The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA’s decision (see Chapter 16) [24 CFR 982.201(f)]. If the family accepts the subsidy then the family will be removed from all other PHA managed waiting lists unless the subsidy they accepted was an FYI voucher. This includes tenant based vouchers, project based vouchers, public housing, multi family housing and affordable housing unless the family declares they want to remain on a waiting list(s).	No	Reduces time spent contacting applicants who are already housed in other Homes for Good housing programs and in turn, increases Homes for Good’s ability to get housing subsidy to those who are in need.
4-III.C	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 such as First Place Family Center , the Red Cross, local Fire Department, etc., of displacement. Referrals must be received within 45 days of the displacement.	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 or a local organization serving displaced families such as the Red Cross, local Fire Department, etc., of displacement.	No	Provides clarity of type of organization where verification can be accessed and creates more access by removing deadline for referral.

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4-III.C	Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.	Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected by their assigned random selection number or on a first-come, first-served basis according to the date and time of their complete application as applicable.	No	Aligns policy of targeted funding and selection preferences with current waitlist structuring.
4-III.D	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.	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. 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. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination; therefore no informal hearing will be offered.	No	Provides clear direction on required action in the instance of no response to a packet or returned mail.
4-III.E	The family must provide the required documentation to the PHA, during regular business hours , within 14 business days of an otherwise complete application.	The family must provide the required documentation to the PHA, within 14 business days of an otherwise complete application.	No	Removes extraneous language and aligns with current procedure.

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4-III.E	<p>Any required documents or information that the family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p>	<p>Any required documents or information that the project based family is unable to provide must be provided within 14 business days of the family being notified of the missing documentation (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p> <p>Tenant based voucher families will be provided additional 14 business days to submit missing documentation if the family has provided a partially complete application before the current deadline. Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p>	No	Clarifies the missing documentation policy for project- and tenant-based vouchers.
5-I.B	[Policy not present]	<p>Attendance for Remote Briefings PHA Policy Applicants who fail to complete the briefing form confirming they completed the remote briefing by the</p>	No	Indicates clear outcome of not notifying PHA of completion of briefing.

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		written deadline will be denied assistance (see Chapter 3).		
5-I.B	<p>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 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 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 opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate. The PHA will conduct remote briefings when available. If applicants are unable to adequately access the video, an in-person alternative or one-on-one briefing over the phone will be provided.</p> <p>The PHA will provide login information and a copy of the briefing packet.</p>	No	Aligns briefing policy with procedure. Allows flexibility for applicants through an asynchronous briefing process.
5-I.B	<ul style="list-style-type: none"> For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance. 	<ul style="list-style-type: none"> For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance. <p>In briefing a family that includes a person with disabilities, PHA must also take steps to ensure effective communication.</p>	Yes	Enhances accessibility of briefing.

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5-I.B	<ul style="list-style-type: none"> • The PHA subsidy standards including when and how exceptions are made. • Materials (e.g., brochures) on how to select a unit and any additional information on selecting a unit that HUD provides. • Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form. • A list of landlords known to the PHA who may be willing to lease a unit to the family or other resources (e.g., newspapers, organizations, online search tools) known to the PHA that may assist the family in locating a unit. PHAs must ensure that the list of landlords or other resources covers areas outside of poverty or minority concentration. • Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to the PHA. • The family obligations under the program, including any obligations of a welfare-to-work family. • The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act. • PHA informal hearing procedures including when the PHA is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing. • An explanation of the advantages of moving to an area that does not have a high concentration of low-income families. 	<ul style="list-style-type: none"> • Materials (e.g., brochures) on how to select a unit and any additional information on selecting a unit that HUD provides (e.g., HUD brochure entitled, "A Good Place to Live"). • Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form, including information on how to complete the form and file a fair housing complaint. • A list of landlords known to the PHA who may be willing to lease a unit to the family or other resources (e.g., newspapers, organizations, online search tools) known to the PHA that may assist the family in locating a unit. PHAs must ensure that the list of landlords or other resources covers areas outside of poverty or minority concentration. • Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to the PHA. • The family obligations under the program, including any obligations of a welfare-to-work family, and any obligations of other special programs if the family is participating in one of those programs. • The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act. • PHA informal hearing procedures including when the PHA is required to offer a 	Yes	Updates what documents will be in the briefing packet

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		<p>participant family the opportunity for an informal hearing, and how to request the hearing.</p> <ul style="list-style-type: none"> An explanation of the advantages of moving to an area that does not have a high concentration of low-income families. The HUD pamphlet on lead-based paint entitled, "Protect Your Family from Lead in Your Home." 		
5-I.B	<p>The PHA will provide the following additional materials in the briefing packet: The HUD pamphlet on lead-based paint entitled <i>Protect Your Family from Lead in Your Home</i> Information on how to fill out and file a housing discrimination complaint form</p>	<p>The PHA will provide the following additional materials in the briefing packet: Information on how to fill out and file a housing discrimination complaint form</p>	No	Removes redundancy with earlier section
5-II.B	Single person families will be allocated one bedroom.	<p>Single person families will be allocated one bedroom.</p> <p>A family that can demonstrate that the birth, adoption or court awarded custody of a child will be obtained within 9 months of determination of eligibility will receive a subsidy standard based on the anticipated addition.</p>	No	Allows families with anticipated family members to qualify for more accurately sized units/vouchers.
5-II.E	<p>The PHA will approve additional extensions only in the following circumstances: It is necessary as a reasonable accommodation for a person with disabilities. It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:</p>	<p>The PHA will approve additional extensions only in the following circumstances: It is necessary as a reasonable accommodation for a person with disabilities. It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances</p>	No	Provides boundaries to extensions to allow other families an opportunity to access subsidy.

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	Serious illness or death in the family Other family emergency Obstacles due to employment Whether the family has already submitted requests for tenancy approval that were not approved by the PHA Whether family size or other special circumstances make it difficult to find a suitable unit	does not guarantee that an extension will be granted: Serious illness or death in the family Other family emergency Obstacles due to employment Whether the family has already submitted requests for tenancy approval that were not approved by the PHA Whether family size or other special circumstances make it difficult to find a suitable unit For reasons beyond the family's control the PHA will limit additional extensions to 240 days		
6-I.H	[Regulatory language not present]	Applying SSA COLA to Current Annual and Interim Reexaminations Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1st or later of the upcoming year [Notice PIH 2018-24].	Yes	Ensures accurate income information is utilized.
6.I.K	The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47]. Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.	<i>Court-Awarded Support</i> The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47]. If the family does not receive the full court-awarded amount and has made reasonable efforts to collect amounts	No	Provides specificity to ensure the accurate assessment of alimony and child support income.

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		<p>due, the PHA will only count the partial amount received. <i>Non-Court-Awarded Support</i> Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection. The PHA will use the verification hierarchy in Chapter 7-I to verify the amounts received by the household and will count their support income as such.</p>		
6-III.A	The PHA will make utility reimbursements to the utility provider. In instances where there is no utility provider and only a utility fee being charged by the landlord the utility reimbursement funds will be issued directly to the family.	The PHA will make utility reimbursements to the utility provider. In instances where there is no utility provider and only a utility fee being charged by the landlord the utility reimbursement funds will be issued directly to the landlord who is acting as the utility provider.	No	Alters who is receiving the utility reimbursements to streamline.
6-III.A	The PHA will issue all utility reimbursements monthly.	The PHA will issue all utility reimbursements monthly to the utility provider.	No	Provides clarity on who is receiving utility reimbursements monthly.
7-I.A	Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.	Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Once an applicant has signed and submitted a new consent form, they are not required to do so again at the next interim or regularly scheduled income reexamination.	Yes	Reduces administrative burden of recollecting consent forms annually.
7-I.D	The PHA may send third-party verification forms directly to the third party. Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.	The PHA may send third-party verification forms directly to the third party. Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.	No	Provides timeframe to ensure verifications are collected in a timely manner.

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		The PHA will proceed to oral third-party verification if the third-party verification forms are not returned within five business days.		
7-I.D	When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.	When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided. When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.	No	Provides timeframe to ensure verifications are collected in a timely manner.
7-II.A	Current employer identification card	Current government employer identification card with picture	No	Provides clarity on acceptable verifications
7-II.D	If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill)	If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation that the person has removed themselves from the lease or a statement from the removed adult member).	No	Provides clarity of examples of acceptable documentation.
7-III.B	At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements. If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-	At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.	No	Reduces Administrative burden and aligns with aspects of Move to Work (MTW)'s triennial reexam process

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	employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.			
7-III.C	Social Security/SSI Benefits	Social Security/SSI Benefits To ensure consistency in the determination of annual Social Security and SSI income, PHAs are required to use EIV-reported Social Security and SSI benefit amounts unless the tenant disputes the EIV-reported amount [Notice PIH 2018-24].	Yes	Adds regulation to the EIV policy around Social Security Income.
7-III.D	If the family declares that it <i>receives regular payments</i> , verification will be obtained in the following order of priority: Copies of the receipts and/or payment stubs for the 60 days prior to PHA request Third-party verification form from the state or local child support enforcement agency Third-party verification form from the person paying the support Family's self-certification of amount received	If the family declares that it <i>receives regular payments</i> , verification will be obtained in the following order of priority: Copy of the ledger/payment history from the support enforcement agency for the 60 days prior to PHA request Third-party verification form from the state or local child support enforcement agency The third-party verification form for the purpose of verification from the state or local support enforcement agency is the submittal of the release of information signed by the applicant/tenant and submitted by the PHA to request the required documentation. Third-party verification form from the person paying the support Refer to the verification hierarchy in Chapter 7-I for subsequent verification steps	No	Clarifying verification hierarchy for child support and alimony.

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10-II.B	<p>If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. The PHA will send the receiving PHA a written confirmation of its decision by mail.</p> <p>The PHA will allow an exception to this policy if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.</p>	<p>The initial PHA’s decision as to whether to accept late billing will be based on internal PHA factors, including the initial PHA’s leasing or funding status. If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline and does not intend to honor the late billing, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. In this case, the PHA will send the receiving PHA a written confirmation of its decision by mail.</p> <p>Among other considerations as to whether to accept late billing will be if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.</p>	No	Provides clarity on when late billing may be accepted
10-II.C	<p>The PHA will require the family to attend a briefing. The PHA will provide the family with a briefing packet (as described in Chapter 5) and, in a group briefing, will orally inform the family about the PHA’s payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process. If the family is unable to attend a group briefing, the PHA will send the briefing packet and briefing DVD for the family to watch and follow up with a phone Q&A session to answer any questions.</p>	<p>The PHA will require the family to attend a 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 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 when available. If applicants are unable</p>	No	Aligns port briefing policy with standard briefing policy.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>to adequately access the video an in-person alternative or one-on-one briefing over the phone will be provided.</p> <p>The PHA will provide login information and a copy of the briefing packet.</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.</p> <p>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 one-on-one briefing over the phone or in person with the PHA.</p>		
10-II.C	The PHA will send its initial billing notice by fax or email, if necessary , to meet the billing deadline but will also send the notice by regular mail.	The PHA will send its initial billing notice by fax or email to meet the billing deadline. If fax or email is unavailable, the PHA will send its initial billing notice via regular mail.	No	Increases flexibility for method of contact
10-II.C	The PHA will send a copy of the updated HUD-50058 by regular mail no later than 14 business days after the effective date of the reexamination.	The PHA will send a copy of the updated HUD-50058 by fax, email, or regular mail no later than 14 business days after the effective date of the reexamination.	No	Increases flexibility for method of contact

Section	Previous Policy	Proposed Policy	Required Change	Impact
11-I.C	If the family moves to a new unit, the PHA will perform a new annual reexamination	If the family moves to a new unit, the PHA will perform a new annual reexamination if the prior reexam was not completed within the 60-days from the move-out date.	No	Describes circumstances in which an annual reexam would be unnecessary.
11-II.B	When any new family member is added, the PHA must make appropriate adjustments in the family share of the rent and the HAP payment at the effective date of either the annual or interim reexamination [24 CFR 982.516(e)(2)].	Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.	Yes	Provides clarity on when a reexamination is required
11-II.B	The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II). The PHA will not approve the addition of a foster child or foster adult if it will cause a violation of HQS space standards.	The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).	No	Removes extraneous language that is clarified elsewhere.
13-I.D	<ul style="list-style-type: none"> Any member of the Congress of the United States 	<ul style="list-style-type: none"> Any member of the Congress of the United States <p>Such "covered individual" may not have any direct or indirect interest in the HAP contract or in any benefits or payments under the contract (including the interest of an immediate family member of such covered individual) while such person is a covered individual or for one year thereafter.</p> <p><i>Immediate family member means the spouse, parent (including a stepparent), child (including a stepchild), grandparent, grandchild, sister, or brother (including a stepsister or</i></p>	Yes	Defines who cannot enter into a Housing Assistance Payment (HAP) Contract.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		stepbrother) of any covered individual.		
13-II.A	The HAP contract is used for all HCV program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and use their assistance to lease the space for the manufactured home. See chapter 15 for a discussion of any special housing types included in the PHA's HCV program.	The HAP contract is used for all HCV tenant-based program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and use their assistance to lease the space for the manufactured home. See chapter 15 for a discussion of any special housing types included in the PHA's HCV program.	Yes	Provides specificity and clarity.
13-II.C	By endorsing the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract.	By accepting the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract.	Yes	Provides clarity of owner certification of compliance.
Chapter 15 Introduction	Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601].	Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601]. A single unit cannot be designated as more than one type of special housing. The PHA cannot give preference to households that wish to live in any of these types of housing and cannot require households to select any of these types of housing [New HCV GB, <i>Special Housing Types</i>, p. 3].	Yes	Provides clarity for special housing types to avoid double subsidy, preference and requirement.
15-I.A	When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person, and the standard form of the HAP contract is used.	When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the	Yes	Provides clarity on type of special housing on Housing Assistance Payment (HAP) contract.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		following special housing type under HUD regulations for the Section 8 voucher program: Single room occupancy (SRO) housing.”		
15-I.C	HQS requirements described in Chapter 8 apply to SRO housing except as modified below.	HQS requirements described in Chapter 8 apply to SRO housing except that sanitary facilities, and space and security characteristics must meet local code standards for SRO housing. In the absence of applicable local code standards for SRO housing, the following standards apply:	Yes	Provides clarity on what needs to be inspected for Single Room Occupancy (SRO) units
15-II.A	When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.	When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Congregate housing.”	Yes	Provides clarity on what needs to be selected in a Housing Assistance Payment (HAP) Contract for Congregate housing
15-II.B	The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area.	The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area for the assisted family.	Yes	Provides clarity that subsidy is only provided for family that is being assisted
15-II.B	When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.	When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the	Yes	Provides clarity for type of special housing on Housing Assistance Payment (HAP) contract.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		following special housing type under HUD regulations for the Section 8 voucher program: Congregate housing."		
15-II.C	<p>Congregate housing must have a refrigerator of appropriate size in the private living area of each resident, a central kitchen and dining facilities located within the premises and accessible to the residents, and food service for the residents, that is not provided by the residents themselves.</p> <p>The housing quality standards applicable to lead-based paint do not apply.</p>	<p>Congregate housing must have a refrigerator of appropriate size in the private living area of each resident, a central kitchen and dining facilities located within the premises and accessible to the residents, and food service for the residents, that is not provided by the residents themselves.</p> <p>The congregate housing must contain adequate facilities and services for the sanitary disposal of food waste and refuse, including facilities for temporary storage where necessary.</p> <p>The housing quality standards applicable to lead-based paint do not apply unless a child under the age of six is expected to reside in the unit.</p>	Yes	Provides clarity on what needs to be inspected for congregate housing
15-III.A	A group home is a state-licensed facility intended for occupancy by elderly persons and/or persons with disabilities.	A group home is a state- approved (licensed, certified, or otherwise approved in writing by the state) facility intended for occupancy by elderly persons and/or persons with disabilities.	Yes	Provides clarity on definition of group home.
15-III.A	When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family, and the standard form of the HAP contract is used.	When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Group home."	Yes	Provides clarity on what needs to be in the Housing Assistance Payment (HAP) Contract for a Group Home

Section	Previous Policy	Proposed Policy	Required Change	Impact
<p>15-III.B</p>	<p>Unless there is a live-in aide, the family unit size for an assisted occupant of a group home must be zero- or one-bedroom, depending on the PHA's subsidy standard. If there is a live-in aide, the aide must be counted in determining the household's unit size.</p> <p>The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the prorata share of the payment standard for the group home size. The prorata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home.</p> <p>The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.</p> <p>The utility allowance for an assisted occupant in a group home is the prorata share of the utility allowance for the group home.</p> <p>The rents paid for participants residing in group homes are subject to generally applicable standards for rent reasonableness. The rent for an assisted person must not exceed the prorata portion of the reasonable rent for the group home. In determining reasonable rent, the PHA should consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.</p>	<p>Unless there is a live-in aide, the family unit size (voucher size) for an assisted occupant of a group home must be zero- or one-bedroom. If there is a live-in aide, the aide must be counted in determining the household's unit size.</p> <p>The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the prorata share of the payment standard for the group home size. The prorata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home. The number of persons in the assisted household equals one assisted person plus any PHA-approved live-in aide.</p> <p>The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.</p> <p>The utility allowance for an assisted occupant in a group home is the prorata share of the family unit size to the utility allowance for the group home.</p> <p>The rents paid for participants residing in group homes are subject to generally applicable standards for rent reasonableness. The rent for an assisted person must not exceed the prorata portion of the reasonable rent for the group home. In determining reasonable rent, the PHA must consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.</p>	<p>Yes</p>	<p>Provides clarity on family voucher size and Live in Aide guidelines for group homes. Provides clarity on utility allowance calculation for prorata share.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
15-III.C	HQS requirements described in Chapter 8 apply to group homes except for the requirements stated below.	The entire unit must comply with HQS requirements described in Chapter 8, except for the requirements stated below.	Yes	Provides clarity on what must be inspection requirements for a Group Home
15-III.C	Group homes must be accessible to and usable by residents with disabilities.	Group homes must be accessible to and usable by residents with disabilities. Doors and windows accessible from outside the unit must be lockable.	Yes	Provides clarity on what is needed to pass inspection for a Group Home
15-III.C	The site and neighborhood should be reasonably free from hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:	The site and neighborhood should be reasonably free from disturbing noises and reverberations, and other hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:	Yes	Provides clarity on what is needed to pass inspection for a Group Home
15-III.C	The housing quality standards applicable to lead-based paint do not apply	The housing quality standards applicable to lead-based paint do not apply unless a child under the age of six is expected to reside in the unit.	Yes	Provides clarity on when lead-based inspections are required in Group Homes
15-IV.A	Shared housing is a single housing unit occupied by an assisted family and another resident or residents.	Families in markets with tight rental conditions or with a prevalence of single-family housing may determine a shared housing living arrangement to be a useful way to secure affordable housing. PHAs offering shared housing as a housing solution may also experience some reduction in the average per-unit-cost (PUC) paid on behalf of assisted families. Shared housing is a single housing unit occupied by an assisted family and another resident or residents.	Yes	Describes circumstances in which shared housing may be beneficial to families and the PHA.

Section	Previous Policy	Proposed Policy	Required Change	Impact
15-IV.A	The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.	<p>The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.</p> <p>When shared housing is offered as a housing option, HUD encourages PHAs to consider ways in which the families may be assisted in finding shared housing, including for-profit shared housing matching (such as roommates or single-family homes) and online sites that charge a fee for their matching services, or nonprofit shared housing matching services. HUD further encourages PHAs to include information about this housing possibility in the family’s voucher briefing.</p>	Yes	Describes various ways in which a household may be assisted by shared housing.
15-IV.A	[No policy present]	<p><u>PHA Policy</u></p> <p>The PHA may provide information to families regarding the shared housing option, including a listing to families of any known rental listings in the community at briefing and upon request.</p>	No	Describes how the PHA will communicate information concerning shared housing.
15-IV.A	[No regulatory language present]	<p>PHAs should be aware of potential local legal barriers to HCV participants using shared housing, which can create additional obstacles for shared housing:</p> <ul style="list-style-type: none"> • Municipalities may have occupancy limits for the number of unrelated persons who may share a housing unit. • Local zoning codes for single family housing may restrict occupancy in 	Yes	Describes potential pitfalls with shared housing and how PHAs can proactively handle them.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>certain areas to households whose family members are related by blood.</p> <p>PHAs should work with local jurisdictions to find solutions that encourage affordable housing and are consistent with the Fair Housing Act, Title VI, and other federal, state, and local fair housing laws. PHAs should inform HUD if they encounter barriers to shared housing that may conflict with fair housing laws.</p>		
15-IV.A	[No policy present]	<p><u>PHA Policy</u></p> <p>The PHA will work with local jurisdictions as necessary to identify solutions consistent with fair housing laws and will inform HUD if the PHA encounters barriers to shared housing that conflict with fair housing laws.</p>	No	Informs how the PHA will handle barriers to shared housing.
15-IV.A	When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used	When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Shared housing."	Yes	Describes the Housing Assistance Contract used within shared housing.
15-IV.B	The prorata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space by the total number of bedrooms in the unit.	The prorata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space, non-shared , by the total number of bedrooms in the unit.	Yes	Describes how to calculate the prorata for shared housing.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP. The utility allowance for an assisted family living in shared housing is the lower of the utility allowance for the family unit size (voucher size) or the prorata share of the utility allowance for the shared housing unit.</p>		
15-IV.B	<p>The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit. In determining reasonable rent, the PHA should consider whether sanitary and food preparation areas are private or shared.</p>	<p>The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP.</p> <p>The utility allowance for an assisted family living in shared housing is the prorata share of the utility allowance for the shared housing unit.</p> <p>The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit. In determining reasonable rent, the PHA should consider whether sanitary and food preparation areas are private or shared.</p>	Yes	Describes how to calculate the prorate for shared housing.
15-V.A	<p>A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged "rent" a cooperative member is charged a "carrying charge."</p> <p>When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used.</p>	<p>A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged "rent" a cooperative member is charged a "carrying charge." The monthly carrying charge includes the member's share of the cooperative debt service, operating expenses, and necessary payments to</p>	Yes	Provides clarity on what documents/contracts are needed for Cooperative Housing

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>cooperative reserve funds. It does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.</p> <p>The occupancy agreement or lease and other appropriate documents must provide that the monthly carrying charge is subject to Section 8 limitations on rent to owner, and the rent must be reasonable as compared to comparable unassisted units.</p> <p>When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Cooperative housing."</p>		
15-V.C	All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements.	<p>All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements. The PHA remedies described in 24 CFR 982.404 do not apply. Rather, if the unit and premises are not maintained in accordance with HQS, the PHA may exercise all available remedies regardless of whether the family or cooperative is responsible for the breach of HQS.</p> <p>No housing assistance payment can be made unless unit meets HQS and the defect is corrected within the period as specified by the PHA and the PHA verifies correction (see Chapter 8).</p>	Yes	Provides clarity on HQS requirements and action taken for noncompliance.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>In addition to regular breaches of HQS, breaches of HQS by the family include failure to perform any maintenance for which the family is responsible in accordance with the terms of the cooperative occupancy agreement [HCV GB].</p>		
<p>15-VI.A</p>	<p>A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in two different ways.</p> <p>(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.</p> <p>(2) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families.</p>	<p>A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in three different ways.</p> <p>(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.</p> <p>(2) A family can purchase a manufactured home under the Housing Choice Voucher Homeownership program.</p> <p>HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families</p>	<p>Yes</p>	<p>Allows manufactured homes to be used for the Housing Choice Voucher (HCV) homeownership program</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
15-VI.B	There is a separate Tenancy Addendum (Form 52642-a) and separate HAP Contract (Form 52642) for this special housing type.	There is a designated HAP Contract (form HUD-52642) and designated Tenancy Addendum (form HUD 52642-A) for this special housing type.	Yes	Provides a new Housing Assistance Payment (HAP) Contract to use for families renting a pad space.
15-VI.C	Initially, and annually thereafter the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly HAP check , the owner certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the manufactured home park or elsewhere.	Initially, and at least annually thereafter, the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly housing assistance payment , the owner of the manufactured home space certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the same manufactured home park or elsewhere. If requested by the PHA, the owner must give the PHA information on rents charged by the owner for other manufactured home spaces.	Yes	Provides clarity on what may be needed to determine rent reasonableness for a pad space
15-VI.D	The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.	The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding. The PHA has a HUD-approved waiver to not require the usage of tie-downs if it is confirmed through inspection that the mobile home is situated in a stable manner on a level lot; if there is continued written verification from state/local agencies that tie-downs are not required for units outside of flood	Yes	Reduces barriers to utilizing manufactured homes

Section	Previous Policy	Proposed Policy	Required Change	Impact
		plains, floodways, nor high wind areas; and if there is information maintained in the tenant’s file and a central file for audit purposes.		
15-VII.A	The PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.	The PHA may choose not to offer homeownership assistance. However, the PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.	Yes	Provides clarity that Homes for Good is not required to provide homeownership assistance.
15-VII.B	The family must meet all of the requirements listed below before the commencement of homeownership assistance.	If the PHA offers the homeownership option, participation by the family is optional. However, the family must meet all of the requirements listed below before the commencement of homeownership assistance.	Yes	Provides clarity that Homes for Good is not required to provide homeownership assistance
15-VII.D	<ul style="list-style-type: none"> The unit must be under construction or already exist at the time the family enters into the contract of sale. <p>The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium.</p>	<ul style="list-style-type: none"> The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium. 	Yes	Removes the information from this section, and expands on units under construction in the following section
15-VII.D	<ul style="list-style-type: none"> For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years. 	<ul style="list-style-type: none"> For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years. Families may enter into contracts of sale for units not yet under construction. However, the PHA will not commence homeownership assistance for the family for that unit until: 	Yes	Provides details on what steps must be taken to use homeownership assistance on units that are not yet under construction

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>1. Either the responsible entity completes the environmental review as required by 24 CFR part 58 and HUD approved the environmental certification and request for release of funds prior to commencement of construction or HUD performed an environmental review under CFR part 50 and notified the PHA in writing of environmental approval of the site prior to construction commencement; and</p> <p>Construction of the unit has been completed and the unit has passed the required HQS inspection and independent inspection as addressed elsewhere in this chapter.</p>		
<p>15-VII.E</p>	<p>1. New clients will be put on a wait list after completing the program eligibility prerequisites.</p> <p>2. Clients with a pre-approval letter will move to the top of the list and will have two years to purchase a home. If they have not purchased a home in this time frame, they will go to the bottom of the list.</p> <p>3. If all 35 S8 HO vouchers are taken, when one becomes available the clients at the top of the list will have 6 months to find a home or they will go to the bottom of the list.</p>	<p>1. New clients will be put on a wait list after completing the program eligibility prerequisites.</p> <p>2. If all 35 S8 HO vouchers are taken, when one becomes available the clients at the top of the list who already a preapproval letter will have 6 months to find a home and be under contract or they will go to the bottom of the list.</p> <p>The family may be required to report their progress on locating and purchasing a home.</p>	<p>No</p>	<p>Provides clarity on how families on the waitlist for homeownership are served</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
15-VII.F	If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program.	If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program. PHA Policy The PHA does not require ongoing post-purchase homeownership counseling.	No	Clarifies that homeownership counseling is not mandatory; however, referrals to appropriate financial counseling are optional.
15-VII.G	This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector may not be a PHA employee.	This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector cannot be a PHA employee or contractor .	No	Provides clarity on who can provide an inspection, in turn reducing conflict of interest
15-VII.G	If the PHA disapproves the purchase of a home, the family will be notified in writing of the reasons for the disapproval.	If the PHA disapproves the purchase of a home, the family will be notified in writing of the reasons for the disapproval. The PHA will not require HQS inspections while the family is receiving homeownership assistance. The family may request an HQS inspection at will.	No	Allows families to access HQS as needed for financial planning purposes.
15-VII.G	<ul style="list-style-type: none"> Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24. 	<ul style="list-style-type: none"> Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24. A contract for the sale of a unit not yet under construction must meet all above requirements, and requirements below. Commencement of construction in violation of the below requirements voids the purchase contract. 	Yes	Ensures homes not yet under construction that are wanted for home ownership are being built on land free from hazards

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<ul style="list-style-type: none"> - The purchaser is not obligated to purchase the unit unless an environmental review has been performed and the site received environmental approval prior to commencement of construction in accordance with 24 CFR 982.628; and <p>The construction will not commence until the environmental review has been completed and the seller has received written notice from the PHA that environmental approval has been obtained. Environmental approval may be conditioned on the contracting parties' agreement to modification to the unit design or to mitigation actions.</p>		
15-VII.H	The PHA will approve a family's request to utilize its Family Self-Sufficiency escrow account for down payment and/or closing costs when purchasing a unit under the HCV homeownership option.	The PHA will approve a family's request to utilize its Family Self-Sufficiency escrow account after final disbursement for down payment and/or closing costs when purchasing a unit under the HCV homeownership option.	No	Provides clarity on when escrow can be accessed
15-VII.I	Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.	Before commencement of homeownership assistance, the family must execute a statement of family obligations in the form prescribed by HUD [form HUD-52649]. In the statement, the family agrees to comply with all family obligations under the homeownership option.	Yes	Provides a HUD process for family to declare their intent to comply with family obligations of the program
15-VII.I	The family must notify the PHA if the family defaults on the mortgage used to purchase the home.	The family must notify the PHA if the family defaults on the mortgage used to purchase the home. The family must provide the PHA with	Yes	Provides clarity on what the family is required to provide when Homes for Good is questioning whether mortgage is being paid.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		information on any satisfaction or payment of the mortgage debt.		
15-VII.K	The payment standard at the most recent regular reexamination of family income and composition since the commencement of homeownership assistance for occupancy of the home. The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.	The payment standard at the most recent regular reexamination of family income and composition since the commencement of homeownership assistance for occupancy of the home.	Yes	Does not limit which lenders families can receive funding from (I.e. lenders who only take one monthly payment). Regulatory language was maintained and moved later in the chapter.
15-VII.K	Homeownership expenses for a cooperative member may only include amounts allowed by the PHA to cover:	The PHA does not have the discretion to exclude any of the listed homeownership expenses or to add any additional items. Homeownership expenses for a cooperative member include amounts allowed by the PHA to cover:	Yes	Provides clarifying language on what is required
15-VII.K	All clients will be notified of their monthly maintenance, repair and replacement allowance amount after their annual recertification paperwork is completed.	All clients will be notified of their monthly maintenance, repair and replacement allowance amount after their annual recertification paperwork is completed. The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.	Yes	Clarifies to whom and when homeownership HAP can be sent to the family and lender so as not to restrict which lenders families can secure mortgages with.
15-VII.M	A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-	A family receiving homeownership assistance may move with continued tenant-based assistance or with voucher homeownership assistance.	Yes	Reduces requirements for homeownership families that want to move

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>based assistance for a new unit cannot begin so long as any family member holds title to the prior home.</p>	<p>The PHA must determine that all initial requirements have been satisfied if a family that has received homeownership assistance wants to move with continued homeownership assistance. However, the following do not apply:</p> <ul style="list-style-type: none"> • The requirement that a family must be a first-time homeowner is not applicable. • The requirement for pre-assistance counseling is not applicable. However, the PHA may require that the family complete additional counseling (before or after moving to a new unit with continued homeownership assistance). <p>Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home. However, when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault or stalking and the move is needed to protect the health or safety of the family or family member (or any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move), such family or family member may be assisted with continued tenant-based assistance even if they own any title or other interest in the prior home.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
15-VII.N	The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy, with the exception of failure to meet obligations under the Family Self-Sufficiency program as prohibited under the alternative requirements set forth in FR Notice 12/29/14	The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy. Homeownership assistance for a family automatically terminates 180 calendar days after the last homeownership assistance payment on behalf of the family. However, a PHA may grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.	Yes	Provides clarity on the automatic termination of homeownership assistance.
16-I	The notice makes clear that other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for "other housing purposes permitted by state and local law," in accordance with 24 CFR 982.155(b)(1).	The notice makes clear that other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for "other housing purposes permitted by state and local law," in accordance with 24 CFR 982.155(b)(1). In addition, as specified in Notice PIH 2022-18, PHAs may use administrative fee funding for both administrative and "other expenses" needed to employ strategies and undertake activities beyond regular administrative responsibilities to facilitate the successful leasing and use of housing choice vouchers by families, such as through the use of security deposit assistance and landlord recruitment and incentive payments, among other allowable expenses specified in the notice. PHAs are also permitted to use UNP for these expenses [Notice PIH 2022-18].	Yes	Allows Homes for Good to use administrative fee for tenant leasing activities.

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-II.A	Copies of the payment standard and utility allowance schedules are available for review in the PHA's offices during normal business hours.	Copies of the payment standard and utility allowance schedules are available for review on the PHA's website and in the PHA's offices during normal business hours upon request .	No	Provides broader access to payment standard and utility allowance schedules.
16-II.B	Unit Availability: The PHA will review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families. Lease-up Time and Success Rate: The PHA will consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.	Unit Availability: The PHA may review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families. Lease-up Time and Success Rate: The PHA may consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.	No	Provides flexibility for factors in determining the payment standard.
16-II.B	A PHA that adopts an exception payment standard area must revise its briefing materials to make families aware of the exception payment standard and the area that it covers.	A PHA that adopts an exception payment standard area must revise its briefing materials to make families aware of the exception payment standard and the area that it covers. In addition, HUD allows PHAs to establish a HUD-Veterans Affairs Supportive Housing (HUD-VASH) exception payment standard. PHAs may go up to but no higher than 120 percent of the FMR or SAFMR specifically for VASH families. PHAs who want to establish a VASH exception payment standard over 120 percent must still request a waiver from HUD (See Section 19-III.E.).	Yes	Assists with Housing Access for VASH tenants.
16-II.B	[No policy present]	<u>PHA Policy</u> The PHA has established an exception payment standard at 120 percent of the FMR for the HUD-VASH program.	No	Specifies the payment standard utilized for the HUD-VASH program.

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-II.C	The PHA has not included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner is not a common practice in Lane County.	The PHA has included an allowance for air-conditioning in its schedule.	No	Allows for more accurate utility allowance schedule due to increased need for air conditioning.
16-IV.A	PHAs are required to include in the administrative plan, policies concerning repayment by a family of amounts owed to the PHA [24 CFR 982.54]. This part describes the PHA's policies for recovery of monies owed to the PHA by families or owners.	PHAs are required to include in the administrative plan, policies concerning repayment by a family of amounts owed to the PHA [24 CFR 982.54]. If the family breaches an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA, the PHA, at its discretion, may offer a family the opportunity to enter an agreement to pay amounts owed to a PHA or amounts paid to an owner by a PHA. The PHA may prescribe the terms of the agreement [24 CFR 982.552(c)(1)(vii). This part describes the PHA's policies for recovery of monies owed to the PHA by families or owners.	Yes	Allows participant families flexibility to pay amounts owed to a PHA.
16-IV.B	If the owner fails to repay the debt within the required time frame and is entitled to future HAP payments, the PHA will reduce the future HAP payments by the amount owed until the debt is paid in full. If the owner is not entitled to future HAP payments the PHA may, in its sole discretion, offer to enter into a repayment agreement on terms prescribed by the PHA. If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement , the PHA may ban the owner from future participation in the program and pursue other modes of collection.	If the owner fails to repay the debt within the required time frame and is entitled to future HAP payments, the PHA will reduce the future HAP payments by the amount owed until the debt is paid in full. If the owner refuses to repay the debt, the PHA may ban the owner from future participation in the program and pursue other modes of collection.	No	Allows PHA recourse when owner refuses to pay amounts owed.

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-IV.B	<p><u>PHA Policy</u> Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.</p> <p>If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate assistance in accordance with the policies in Chapter 12 and pursue other modes of collection.</p>	<p>Families are required to reimburse the PHA if they were charged less rent than required because the family either underreported or failed to report income. PHAs are required to determine retroactive rent amounts as far back as the PHA has documentation of family unreported income [Notice PIH 2018-18].</p> <p><u>PHA Policy</u> Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.</p> <p><u>Refusal to Enter into an Agreement</u> If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA must terminate assistance [Notice PIH 2018-18].</p>	Yes	Allows options to collect amounts owed if family refuses to pay.
16-IV.B	[No policy present]	<p><u>PHA Policy</u> When a family refuses to repay monies owed to the PHA, in addition to termination of program assistance, the PHA will utilize other available collection alternatives including, but not limited to, the following:</p> <ul style="list-style-type: none"> Collection agencies Small claims court Civil lawsuit State income tax set-off program 	No	Allows options to collect amounts owed if family refuses to pay.

Section	Previous Policy	Proposed Policy	Required Change	Impact
16-IV.B	<i>Execution of the Agreement</i>	<i>Execution of the Agreement</i> All repayment agreements must be in writing, dated, and signed by both the family and the PHA [Notice PIH 2018-18].	Yes	Provides clarity on agreement of repayment.
16-IV.B	Repayment Agreements Involving Improper Payments Notice PIH 2017-12 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:	Repayment Agreement Terms All repayment agreements must be in writing, dated, signed by both the family and the PHA, include the total retroactive rent amount owed, any amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount. Notice PIH 2018-18 requires certain provisions, at a minimum , be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:	Yes	Provides clarity on what is included on repayment agreements.
16-V.C	Points are based on the percent of reexaminations that are more than 2 months overdue, according to data from PIC.	Points are based on the percent of reexaminations that are less than two months overdue, according to data from PIC.	Yes	Updates definition of late annual indicator.
16-V.C	Points are based on the percent of newly leased units that passed HQS inspection prior to the effective date of the lease and HAP contract, according to data from PIC.	Points are based on the percent of newly leased units that passed HQS inspection on or before the effective date of the lease and HAP contract, according to data from PIC.	Yes	Provides clarity to inspection pass date in relation to HAP contract start date.
16.VI.B	Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.	The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101]. The PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed	Yes	Provides clarity on record retention period for 58's and EIV's.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>three years from the EOP date [Notice PIH 2018-18].</p> <p>Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.</p>		
16-VIII.B	If the total annual HAP needs equal or exceed the annual budget authority, or if the PHA cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, the PHA will be considered to have insufficient funding.	If the total annual HAP needs equal or exceed the annual budget authority and funding reserves , or if the PHA cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, the PHA will be considered to have insufficient funding.	No	Provides clarity on PHA funds available.
Exhibit 16-3	Emergency transfers will not take priority over waiting list admissions for these programs. At your request, the PHA will refer you to organizations that may be able to further assist you.	<p>Emergency transfers will not take priority over waiting list admissions for these programs. At your request, the PHA will refer you to organizations that may be able to further assist you.</p> <p>Emergency transfers may be able to utilize a local preference when applying into other programs.</p>	No	Provides flexibility for emergency transfers.
17-I.A	Units qualify under this exception if the units:	For units under a HAP contract that was first executed on or after April 18, 2017, units qualify under this exception if the units:	Yes	Provides clarity on timeframe of exception.
17-I.A	Only units that that are under a HAP contract that was first executed on or after April 18, 2017, are covered by the 10 percent exception.	PBV units that house eligible youth receiving FUPY/FYI assistance are also covered by this 10 percent exception authority if the units are under a HAP contract that became effective after December 27, 2020, and if the unit is occupied by an eligible youth receiving FUPY/FYI assistance. FYI TPVs that were awarded under Notice PIH 2019-20 are	Yes	Clarifies when FUP/FYI assistance is included in the exception.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>not part of this exception since PHAs are prohibited from project-basing FYI TPVs. Units added after December 27, 2020, through an amendment of a HAP contract that became effective after December 27, 2020, are eligible for this 10 percent exception authority. In contrast, units added after December 27, 2020, through an amendment of a HAP contract that became effective on or prior to December 27, 2020, are not eligible for this 10 percent exception authority [FR Notice 1/24/22]. See Chapter 19 for policies specific to project-basing FUPY vouchers.</p>		
<p>17-II.F</p>	<p>Projects where these caps were implemented prior to HOTMA (HAP contracts executed prior to April 18, 2017) may continue to use the former exceptions and may renew their HAP contracts under the old requirements, unless the PHA and owner agree to change the conditions of the HAP contract. However, this change may not be made if it would jeopardize an assisted family's eligibility for continued assistance in the project.</p>	<p>Under the Fostering Stable Housing Opportunities (FSHO) amendments, units exclusively made available to youth receiving FUPY/FYI assistance may be excepted from the project cap for HAP contracts first effective after December 27, 2020. For more information on excepted units for FUPY, see Chapter 19. Projects where these caps were implemented prior to HOTMA (HAP contracts executed prior to April 18, 2017) or FSHO (contract in effect on or prior to December 27, 2020) may continue to use the former exceptions and may renew their HAP contracts under the old requirements, unless the PHA and owner agree to change the conditions of the HAP contract.</p>	<p>Yes</p>	<p>Provides access to create more project based voucher units beyond what is currently allowable.</p>
<p>17-II.F</p>	<p>Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21] PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in</p>	<p>Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21] PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project</p>	<p>Yes</p>	<p>Regulatory language was removed as five years has expired.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>these projects may receive PBV assistance. To qualify for the exception, the unit must:</p> <ul style="list-style-type: none"> • Be covered by a PBV HAP contract that first became effective on or after 4/18/17; and • In the five years prior to the date the PHA either issued the RFP under which the project was selected or the PHA selected the project without competition, the unit met at least one of the two following conditions: <ul style="list-style-type: none"> - The unit received Public Housing Capital or Operating Funds, Project-Based Rental Assistance, Housing for the Elderly (Section 303), Housing for Persons with disabilities (Section 811), the Rental Supplement program, - The unit was subject to a rent restriction as a result of one of the following HUD loans or insurance programs: Section 236, Section 221(d)(3) or (d)(4) BMIR, Housing for the Elderly (Section 202), or Housing for Persons with Disabilities (Section 811) <p>Units that were previously receiving PBV assistance are not covered by the exception. Both existing and rehabilitation units are eligible for this exception. Newly constructed units qualify if they meet the definition of <i>replacement unit</i> described in FR Notice 1/18/17.</p>	<p>cap. In other words, 100 percent of the units in these projects may receive PBV assistance.</p>		
<p>17-III.D</p>	<p>Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14] At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.</p>	<p>Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14] At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.</p>	<p>Yes</p>	<p>Provides Homes for Good flexibility to use another inspection instead of Housing Quality Standards (HQS)</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	Turnover inspections are not counted toward meeting this inspection requirement.	Turnover inspections are not counted toward meeting this inspection requirement. The PHA also has the option in certain mixed finance properties to rely on alternative inspections conducted at least triennially.		
17-VII.C	The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.	The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member or if the family's household composition is not in violation of HQS standards.	No	Allows families to remain housed if they don't meet occupancy standards, but still meet Housing Quality Standards i.e.) two persons per bedroom, and two persons per sleeping area
17-VIII.A	During the term of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a five percent or greater decrease in the published FMR.	During the term of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a ten percent or greater decrease in the published FMR.	Yes	Rent changes for PBV units are now assessed at a higher threshold (10%).
Exhibit 17-2	<ul style="list-style-type: none"> • [Not present] 	<ul style="list-style-type: none"> • [Added into plan] 	Yes	Provides further information on the special provisions applying to TPV's awarded as a part of a voluntary conversion of public housing units in projects that include RAD PBV units.
18-VI.B	<ul style="list-style-type: none"> • A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; and • The amount of any charges for food, furniture, or supportive services. 	<ul style="list-style-type: none"> • A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; • The amount of any charges for food, furniture, or supportive services; and <p>For any family admitted following conversion, the lease must specify what will happen if the family elects to remain in its unit after increasing its income such that it requires zero HAP. Specifically, the</p>	Yes	Clarifies lease requirements for RAD PBV.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>lease must make clear how the tenant rent will be calculated, and it must address the transition to a new lease.</p>		
<p>18-VI.B</p>	<p>If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.</p>	<p>If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.</p> <p>Per the RAD Use Agreement, the owner may charge the family a rent that does not exceed 30 percent of 80 percent of the area median income. If a unit is removed from the RAD PBV HAP contract, then the lease terminates automatically, as stated in the tenancy addendum, as though the RAD PBV HAP contract had been terminated. The tenant must be offered a new lease, which must reflect the new tenant rent. A tenant in this circumstance is no longer a program participant and therefore no longer benefits from any of the rights or protections specific to RAD, or to the PBV program. Should the family subsequently lose employment, the owner may choose to reduce the family's rent, but if the family wishes to be admitted to the HCV/PBV program, then it must be admitted through the waiting list like any other applicant.</p>	<p>Yes</p>	<p>Provides clarity on what happens when a RAD family is no longer receiving a housing subsidy.</p>
<p>18-VI.B</p>	<p>Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. Otherwise the security deposit requirements for standard PBV apply.</p>	<p>Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. If a tenant residing in a converting project has not previously provided a security deposit, then the owner may collect a security</p>	<p>Yes</p>	<p>Provides clarity on when a security deposit can be collected, allowing for one to be collected if not previously done so.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		deposit at the time of initial lease execution. Otherwise the security deposit requirements for standard PBV apply.		
18-VI.E	The PHA may make exceptions to this 30-day period if needed for reasons beyond the family’s control such as death, serious illness, other medical emergency of a family member,	The PHA may make exceptions to this 30-day period if needed for reasons beyond the family’s control such as death, serious illness, other medical emergency of a family member, or if the family’s household composition is not in violation of HQS standards.	No	Provides family more opportunity to remain housed as long as Housing Quality Standards (HQS) is met.
18-VI.E	Choice Mobility [Notice PIH 2019-23]	Choice Mobility [Notice PIH 2019-23; PRRAC Choice Mobility Implementation Guidance, 8/20] <i>Family’s Right to Choice Mobility Under RAD PBV, the choice mobility option provides families with the opportunity to move with continued assistance any time after 12 months of occupancy. All residents in converted properties should be aware of their housing mobility rights and of their options in a range of neighborhoods.</i>	Yes	Clarifies when families are eligible for choice mobility and requirements of information provided to residents.
18-VI.E	[No policy present]	To ensure that residents are fully aware of and understand their rights under choice mobility, the PHA will inform families of their rights under the choice mobility option and the benefits to moving to lower poverty areas, and provide a summary of the steps necessary to exercise this option, at the time the family signs the lease for the RAD PBV unit and during their annual recertification. Information on choice mobility will be made accessible to persons with disabilities, ensuring any information, electronic or otherwise, is accessible for	No	Provides clarity on the information to be provided to RAD families regarding choice mobility.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>persons with vision, hearing, and other disabilities. This information will also be made available in accordance with Limited English Proficiency (LEP) requirements, including document translation and user of interpretation services. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements.</p>		
18-VI.E	<p>If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.</p>	<p>Families are eligible to move with continued assistance under choice mobility after 12 months of occupancy. If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.</p>	Yes	Clarifies when families are eligible for choice mobility
18-VI.E	<p>The choice mobility waiting list will be organized by date received of the family's written request to exercise choice mobility.</p>	<p>The choice mobility waiting list will be organized by date received of the family's written request to exercise choice mobility. The PHA will not subject RAD PBV families applying for choice mobility vouchers to any additional rescreening requirements in order to receive a tenant-based voucher. Families exercising choice mobility will not be required to vacate their units before a lease has been entered into using their tenant-based voucher. At the time the PHA issues a choice mobility voucher, the PHA will notify the family of their right to remain in their unit if they are unable find a rental unit using the tenant-based voucher.</p>	No	Provides families stable housing in the RAD PBV unit while they look for a unit with their HCV voucher
18-VII.B	<p>Contract rents will be adjusted annually only by HUD's operating cost adjustment factor (OCAF) at each anniversary of the HAP contract, subject to the availability of appropriations for each year of the</p>	<p>RAD PBV contract rents are adjusted differently than contract rents in the standard PBV program. At each annual anniversary of the HAP contract, contract</p>	Yes	Provides clarity on how rent increases are calculated for RAD PBV units

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>contract term. As such, section 8(o)(13)(I) of the 1937 Act, and 24 CFR 983.301 and 983.302, concerning rent determinations, do not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent charged for comparable unassisted units in the private market, as determined by the contract administrator in accordance with 24 CFR 983.303.</p> <p>Contract rents may not exceed the reasonable rent, with the exception that the contract rent for each unit may not be reduced below the initial contract rent under the initial HAP contract.</p>	<p>rents will be adjusted annually only by HUD's operating cost adjustment factor (OCAF) that is applied to the current contract rent, less the portion of the rent paid for debt service, subject to the availability of appropriations for each year of the contract term. As such, section 8(o)(13)(I) of the 1937 Act, and 24 CFR 983.301 and 983.302, concerning rent determinations, do not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent charged for comparable unassisted units in the private market, as determined by the contract administrator in accordance with 24 CFR 983.303.</p> <p>Contract rents may not exceed the reasonable rent (as determined by the PHA that administers the contract or the independent entity, as applicable), with the exception that the contract rent for each unit may not be reduced below the initial contract rent under the initial HAP contract.</p>		
18-VII.B	<p>The administering PHA (or independent entity, if the project is PHA-owned) is responsible for processing rent adjustments, at each contract anniversary date, in accordance with the prevailing OCAF</p>	<p>The PHA who administers the contract (directly or via an independent entity) must maintain records to demonstrate how OCAF amounts were determined and how rent adjustments were calculated. HUD approval of rent adjustments is not required.</p> <p>Properties are eligible to receive prior years' OCAF adjustments for years in which the OCAF was not taken. The OCAF must be applied retroactively if it was missed. The PHA administering the contract (or the independent entity) must make sure that all OCAFs have been applied correctly since the</p>	Yes	Provides clarity for owners on the OCAF requirement and process for rent adjustments.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>RAD closing and calculate the current rents accordingly, including making sure that the RAD PBV contract rents do not exceed the PBV program caps.</p>		
<p>18-VII.B</p>	<p>[No policy present]</p>	<p><u>PHA Policy</u> The owner will request a contract rent adjustment from the PHA who administers the contract within 120 days, but no less than 60 days, prior to the HAP contract anniversary date by submitting a completed OCAF rent adjustment worksheet (Form HUD-9624). The independent entity will validate the data on the form and determine whether the rent exceeds the reasonable rent charged for comparable unassisted units in the private market, in accordance with 24 CFR 983.303. If rents would be unreasonable following application of the requested OCAF, then the rent will only be increased up to the reasonable rent. The independent entity will notify the PHA who administers the contract in writing of the results of its review of the rent adjustment request. The PHA who administers the contract will retain a copy of the worksheet and any other records necessary to demonstrate how the OCAF was used to make rent adjustments for audit purposes. The approved rent adjustment will go into effect via written notice from the PHA that administers the project to the owner. This notice will constitute an amendment to the rents specified on Exhibit A of the RAD PBV HAP contract. The new rents to owner will take</p>	<p>No</p>	<p>Provides clarity for owners on the OCAF requirement and process for rent adjustments.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		effect on the date of the contract anniversary.		
18-VII.C	After conversion, the PHA may maintain a utility allowance schedule for tenant-paid utilities in accordance with standard PBV and HCV utility allowance regulations at 24 CFR 983.301(f)(2)(ii) and 24 CFR 982.517 respectively. The PHA may instead, however, apply site specific utility allowances. HUD waived the requirement for the standard PBV program that the HCV utility allowance be used. If a site-specific utility allowance is used, the utility allowance is applicable to non-RAD PBV units in the project and is calculated consistent with Notice H 2015 04.	After conversion the PHA that administers the contract must maintain the utility allowance schedule. The PHA may either maintain a utility allowance schedule for tenant-paid utilities in accordance with standard PBV and HCV utility allowance regulations at 24 CFR 983.301(f)(2)(ii) and 24 CFR 982.517, respectively, or the PHA may instead, however, apply site specific utility allowances. HUD waived the requirement for the standard PBV program that the HCV utility allowance be used. If a site-specific utility allowance is used, the utility allowance is applicable to non-RAD PBV units in the project and is calculated consistent with Notice H 2015 04. Each family transitions to the new utility allowance at their first recertification following conversion.	Yes	Provides clarity for when new utility allowance will be in effect and clarifies options on implementing utility allowance.
18-VIII.D	The PHA must communicate this policy in writing to affected residents.	The PHA must communicate this policy in writing to affected residents. Any non-RAD PBV units located in the same covered project are subject to the terms of the phase-in provisions.	Yes	Changes policy provision to regulatory provision.
18-VIII.D	Once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward.	Once the standard TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward. If the family's income falls during the phase-in period such that the currently calculated PBV TTP falls below the amount that would otherwise be the phased-in rent, the family pays the currently calculated PBV TTP and the phase-in ends.	Yes	Provides clarity to phase in required period.

Section	Previous Policy	Proposed Policy	Required Change	Impact
Chapter 19	[N/A]	[Added]	Yes	Provides chapter with regulation and policy regarding special voucher types.