



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

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

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

Section	Current Policy	Proposed Policy	Required Change	Impact
<b>6-I.C</b>	The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.	The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below. <b>MTW Policy</b> <b>The PHA is using a triennial reexam schedule excluding homeownership and FYI vouchers.</b>	No	Provides families opportunity to retain income for a longer period of time before it is calculated by Homes for Good. Provides Administrative relief to staff.
<b>6-I.H</b>	Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income. Additionally, any deferred disability benefits that are received in a lump-sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [24 CFR 5.609(c)(14)].	Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income. Additionally, any deferred disability benefits that are received in a lump-sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [24 CFR 5.609(c)(14)]. <b>MTW Policy</b> <b>The PHA will not adjust the subsidy retroactively for any delayed start of periodic payments received and reported during the period in which the PHA is processing an annual reexam.</b>	No	Not doing a retroactive payment aligns with a triennial income review process
<b>6-III.C</b>	Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].	Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment	No	Allows the benefit of the increased Payment

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		standard until their next annual reexamination [HCV GB, p. 7-8]. <b>MTW Policy</b> <b>Interim reexams as a result of a rent increase request from the landlord will result in the most current payment standard being applied.</b>		Standard to be applied when it is needed.
<b>6-III.C</b>	If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR.	If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR. <b>MTW Policy</b> <b>Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA's reasonable accommodation approval process.</b>	No	Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.
<b>8-II.A</b>	<ul style="list-style-type: none"> <li><i>Quality Control Inspections.</i> HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with the HQS.</li> </ul>	<ul style="list-style-type: none"> <li><i>Quality Control Inspections.</i> HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with the HQS.   <b>MTW Policy</b>  <b>The PHA engages in prequalifying unit inspections (HCV).</b></li> </ul>	Yes	Reduces the amount of time to provide subsidy to a prospective unit.
<b>8-II.A</b>	The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).	The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the	No	Reduces Administrative burden in having to contract an

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		<p>PHA is itself the unit of general local government or an agency of such government).</p> <p><b><u>MTW Policy</u></b>  <b>Using its MTW authority, Homes for Good waived the requirements of 24 CFR 982.352(b). This waiver allows Homes for Good to conduct HQS inspections on units it owns, such as those in its Project-Based Voucher portfolio.</b></p>		<p>outside inspector and allows Homes for Good to complete inspections quickly.</p>
<b>8-II.B</b>	<p>The unit must pass the HQS inspection on or before the effective date of the HAP contract.</p> <p>The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.</p>	<p>The unit must pass the HQS inspection on or before the effective date of the HAP contract.</p> <p>The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.</p> <p><b><u>MTW Policy</u></b>  <b>The PHA engages in prequalifying unit inspections (HCV).</b></p> <p><i>Vacant Units with No Attached RTA</i></p> <p><b>For prequalifying unit inspections, the PHA will inspect one-bedroom units and smaller with the assumption that no children under the age of six will reside in the unit.</b></p> <p><b>For prequalifying unit inspections of units with two or more bedrooms, the PHA will inspect the unit with the assumption that a child under the age of six may reside in the unit.</b></p> <p><b>Prequalifying unit inspections cannot be utilized by households that are required to use portions of the unit as sleeping areas prior to the completion of the inspection.</b></p>	Yes	<p>Allows for pre-inspections to be completed and provides guidelines within which they would be permissible. Facilitates earlier subsidy start dates for participants because the units will already have passed inspection.</p>

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		<p><i>Vacant Units with an Attached RTA</i></p> <p><b>Prequalifying unit inspections will be completed for vacant units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</b></p> <p><b>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</b></p> <p><i>Occupied Units with an Attached RTA</i></p> <p><b>Prequalifying unit inspections will be completed for occupied units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</b></p> <p><b>If the RTA is not approved for an occupied unit, the prequalifying unit inspection will be voided.</b></p> <p><b>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</b></p> <p><i>Occupied Units without an Attached RTAA</i> <b>PHA will not complete a prequalifying inspection.</b></p>		
<b>8-II.B</b>	<p><u>PHA Policy</u></p> <p>The PHA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).</p>	<p><u>PHA Policy</u></p> <p>The PHA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).</p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA will complete the prequalifying unit inspection for initial</b></p>	Yes	Specifies the timeline of prequalifying inspection to be completed. Aligns the timelines from "request" to "inspection" with RTA policy.

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		<p><b>inspection within 15 days of the PHA receiving a written request for prequalifying unit inspection.</b></p>		
<b>8-II.B</b>	<p>Following a failed reinspection(s) where the unit was rejected, the family may submit a new Request for Tenancy Approval after the owner has made repairs, if they are unable to locate another suitable unit.</p>	<p>Following a failed reinspection(s) where the unit was rejected, the family may submit a new Request for Tenancy Approval after the owner has made repairs, if they are unable to locate another suitable unit.</p> <p><b><u>MTW Policy</u></b></p> <p><b>In order for the prequalifying unit inspection to serve as the initial unit inspection, the prequalifying unit inspection must have an HQS pass date that is no greater than 90 calendar days from the receipt of the Request for Tenancy Approval by the PHA given that the inspection was completed within 90 days of occupancy.</b></p> <p><b>The PHA may offer up to two reinspections for a prequalifying unit inspection.</b></p>	Yes	<p>Reduces administrative burden by limiting prequalifying reinspections to two and allows passed inspections to be valid for 90 days.</p>
<b>8-II.B</b>	<p>If the family is responsible for supplying the trash service, the PHA will allow the trash service to be placed in the unit after the unit has met all other HQS requirements. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon certification from the family that the trash service has been installed. Trash service is defined as: a garbage can with a lid that will be transported to a recycling/trash center on a regular basis or service from a local trash removal provider such as Sanipac or Lane Apex.</p>	<p>If the family is responsible for supplying the trash service, the PHA will allow the trash service to be placed in the unit after the unit has met all other HQS requirements. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon certification from the family that the trash service has been installed. Trash service is defined as: a garbage can with a lid that will be transported to a recycling/trash center on a regular basis or service from a local trash removal provider such as Sanipac or Lane Apex.</p>	Yes	<p>Clarifies which utilities need to be in place for a prequalifying inspection. Allows tenant provided trash to be established after inspection and before HAP execution.</p>

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		<p><b><u>MTW Policy</u></b></p> <p><b>All utilities must be in place and operational for a prequalifying unit inspection with the exception of tenant-supplied trash service. Should a family submit an RTA for a prequalifying unit that has passed HQS, the PHA will allow the trash service to be placed in the unit. The required trash service must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP Contract based upon written certification from the family that the trash service has been installed.</b></p>		
<p><b>8-II.B</b></p>	<p><u>PHA Policy</u></p> <p>If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.</p>	<p><u>PHA Policy</u></p> <p>If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.</p> <p><b><u>MTW Policy</u></b></p> <p><b>If the family is responsible for supplying the stove and/or refrigerator and they have submitted an RTA for a prequalifying unit that has passed HQS, the PHA will allow the stove and refrigerator to be placed in the unit as long as all required appliances are</b></p>	<p>Yes</p>	<p>Clarifies when appliances need to be in place for a prequalifying inspection. Aligns with regular move in policy for tenant supplied appliances.</p>

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		<p><b>present before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a written certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.</b></p>		
<p><b>8-II.C</b></p>	<p><u>PHA Policy</u></p> <p>Each unit under HAP contract must be inspected biennially within 24 months of the last full HQS inspection. The PHA reserves the right to require annual inspections of any unit or owner at any time.</p> <p>The PHA will not rely on alternative inspection standards.</p>	<p><u>PHA Policy</u></p> <p>Each unit under HAP contract must be inspected biennially within 24 months of the last full HQS inspection. The PHA reserves the right to require annual inspections of any unit or owner at any time.</p> <p>The PHA will not rely on alternative inspection standards.</p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA engages in triennial HQS inspections. The PHA reserves the right to require annual or biennial inspections of any unit or owner at any time.</b></p>	<p>Yes</p>	<p>Reduces administrative burden by allowing Housing Quality Standard inspection to occur triennially.</p>
<p><b>8-II.D</b></p>	<p><u>PHA Policy</u></p> <p>During a special inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.</p> <p>If the annual/biennial inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full annual/biennial inspection.</p>	<p><u>PHA Policy</u></p> <p>During a special inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.</p> <p>If the annual/biennial inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full annual/biennial inspection.</p> <p><b><u>MTW Policy</u></b></p>	<p>Yes</p>	<p>Allows a participant who moved in with a prequalifying inspection to request a more current inspection to address any HQS concerns they have within a specified window of time.</p>



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		<p><b>A participant who has utilized a prequalifying unit inspection can request an interim inspection within 90 calendar days of the start of their Housing Assistance Payment contract.</b></p> <p><b>Participants may request an interim inspection by providing the PHA a copy of the written maintenance request submitted to the unit owner and the owner has had at least 15 full calendar days to address the maintenance concerns. Should the HQS concerns be life-threatening, the PHA will conduct an interim inspection within 24 hours.</b></p>		
<p><b>8-II.E</b></p>	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.</p> <p>The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.</p>	<p>HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.</p> <p>The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.</p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA will sample both PHA-owned and non-PHA-owned units to conduct quality control inspections. For those units selected, a quality control of rent reasonableness for PHA-owned units will also be completed.</b></p>	<p>No</p>	<p>Ensures that adequate quality control is being taken across PHA-owned and non-PHA-owned units for both HQS and rent reasonableness.</p>
<p><b>8-II.F</b></p>	<p>Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if</p>	<p>Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved</p>	<p>Yes</p>	<p>Provides participants who utilize prequalifying</p>

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	applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).	extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).  <b><u>MTW Policy</u></b>  <b>Participants moving into units with passed prequalifying unit inspections will be provided with a copy of the passed HQS inspection report upon approval of the RTA.</b>		inspections a copy of the inspection report.
<b>8-III.A</b>	The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).	The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).  <b><u>MTW Policy</u></b>  <b>Using its MTW authority, Homes for Good opted to determine rent reasonableness for units that the agency owns without using an independent entity. As vacancies occur within properties owned by Homes for Good, the Rental Assistance Division will conduct rent reasonableness determinations using the standard currently used to perform all other Housing Choice Voucher rent reasonableness determinations. A quality control of rent reasonableness for PHA-owned units will be completed.</b>	No	Reduces Administrative burden in having to contract an outside entity to complete the rent reasonableness process and allows Homes for Good to complete the process quickly.
<b>8-III.B</b>	All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.	All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.	No	Allows the benefit of the increased Payment Standard to be

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		<p><b><u>MTW Policy</u></b></p> <p><b>All rent adjustments will utilize the most current payment standard upon execution of the mid-year rent increase.</b></p>		applied when it is needed.
<b>11.I.A</b>	The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.	<p>The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.</p> <p><b><u>MTW Policy</u></b></p> <p><b>This PHA will conduct reexams on a triennial basis with the exception of Homeownership and Foster Youth to Independence (FYI) vouchers.</b></p>	No	Provides families opportunity to retain income for a longer period of time before it is calculated by Homes for Good. Provides Administrative relief to staff.
<b>11-II.B</b>	<p><u>PHA Policy</u></p> <p>The PHA will not conduct a reexamination of income when a new family member is added. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member. However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p>	<p><u>PHA Policy</u></p> <p>The PHA will not conduct a reexamination of income when a new family member is added. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member. However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA will not conduct a reexamination of income when a new</b></p>	No	Reduces Administrative burden by reducing the number of interims needed. Captures income of new adult family members.

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		<p><b>family member is added who is a minor. The PHA will conduct a reexamination of income when a new family member is added who is an adult family member. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member.</b></p>		
<b>11-III.B</b>	<ul style="list-style-type: none"> <li>If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.</li> </ul>	<ul style="list-style-type: none"> <li>If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.</li> </ul> <p><b><u>MTW Policy</u></b>  <b>Interim reexams as a result of a rent increase request from the landlord will result in the most current payment standard being applied.</b></p>	No	Allows the benefit of the increased Payment Standard to be applied when it is needed.
<b>14-I.B</b>	<p><u>PHA Policy</u></p> <p>In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.</p> <p>The PHA routinely will use HUD and other non-HUD sources of up-front income verification. This includes EIV and any other private or public databases available to the PHA.</p> <p>At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.</p> <p>The PHA will compare family-reported income and expenditures to detect possible unreported income.</p>	<p><u>PHA Policy</u></p> <p>In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.</p> <p>The PHA routinely will use HUD and other non-HUD sources of up-front income verification. This includes EIV and any other private or public databases available to the PHA.</p> <p>At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.</p>	No	Provides guidelines in which quality control will be conducted without the submission of SEMAP. Reduces administrative burden to not submit a SEMAP report to HUD.

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		<p>The PHA will compare family-reported income and expenditures to detect possible unreported income.</p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA will complete monthly quality control reviews (i.e. EIV reports, multisubsidy reports, identity verification reports, etc) to assess that applicable HUD regulations, policies, and procedures are being adhered to.</b></p>		
<p><b>Chapter 15</b></p>	<p><u>Part VII: Homeownership</u></p>	<p><u>Part VII: Homeownership</u></p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA’s triennial re-examination policy does not apply to the Homeownership program. Homeownership families will continue to undergo an annual reexam process.</b></p>	<p>No</p>	<p>Clarifies the reexamination schedule for the Section 8 Homeownership program.</p>
<p><b>16-II.B</b></p>	<p><u>PHA Policy</u> The PHA has established an exception payment standard at 120 percent of the FMR for the HUD-VASH program.</p>	<p><u>PHA Policy</u> The PHA has established an exception payment standard at 120 percent of the FMR for the HUD-VASH program.</p> <p><b><u>MTW Policy</u></b></p> <p><b>Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA’s reasonable accommodation approval process.</b></p>	<p>No</p>	<p>Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.</p>

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<b>17-II.B</b>	<ul style="list-style-type: none"> <li>The PHA may select proposal that were previously selected based on a competition. This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition.</li> </ul>	<ul style="list-style-type: none"> <li>The PHA may select proposal that were previously selected based on a competition. This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition.</li> </ul> <p><b>MTW Policy</b>  <b>Homes for Good may select projects under its MTW authority without engaging in a competitive process. Projects selected must be approved by the Homes for Good Board of Commissioners and are subject to HUD's requirements regarding environmental and subsidy layering reviews, if applicable.</b></p>	No	Reduces Administrative burden by not having to engage in the public process of awarding PBV.
<b>17-III.D</b>	<p><u>PHA Policy</u>  The PHA will inspect on an annual basis 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.  Or</p>	<p><u>PHA Policy</u>  The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the</p>	Yes	Reduces administrative burden by allowing Housing Quality Standard

Section	Current Policy	Proposed Policy	Required Change	Impact
	The PHA will inspect on an biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.	<p>premises are maintained in accordance with HQS. Or The PHA will inspect on an biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.</p> <p><b><u>MTW Policy</u></b> <b>The PHA may engage in a triennial inspection schedule.</b></p>		inspection to occur triennially.
<b>17-VII.C</b>	<p>If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance.</p> <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>If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance.</p> <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><b><u>MTW Policy</u></b> <b>Access to continued tenant-based assistance for permanent supportive housing (PSH) projects will be obtained via local preference referral from an approved entity. For non-PSH project based voucher households, the current twelve months of occupancy before choice mobility can be obtained will remain.</b></p>	No	Limits when choice mobility can be accessed by permanent supportive housing families.

Section	Current Policy	Proposed Policy	Required Change	Impact
<b>17-VIII.B</b>	In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.	In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints. <b><u>MTW Policy</u></b> <b>Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA's reasonable accommodation approval process.</b>	No	Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.
<b>18-III.D</b>	<u>PHA Policy</u> The PHA will inspect on an annual basis 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. Or The PHA will inspect on a biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program.	<u>PHA Policy</u> The PHA will inspect on an annual basis 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. Or The PHA will inspect on a biennial basis all units that are under a Part A of the Tenancy Addendum of the PBV Program. <b><u>MTW Policy</u></b> <b>The PHA may engage in a triennial inspection schedule.</b>	Yes	Reduces administrative burden by allowing Housing Quality Standard inspection to occur triennially.
<b>TPS-V.C</b>	<u>PHA Policy</u> To expedite the leasing process, the PHA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for	<u>PHA Policy</u> To expedite the leasing process, the PHA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without	Yes	Allows for pre-inspections to be completed and provides guidelines within which they would be



Section	Current Policy	Proposed Policy	Required Change	Impact
	<p>Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.</p> <p>The family will be free to select his or her unit.</p> <p>When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections</p>	<p>intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.</p> <p>The family will be free to select his or her unit.</p> <p>When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections.</p> <p><b><u>MTW Policy</u></b></p> <p><b>The PHA engages in prequalifying inspections.</b></p> <p><b>The PHA will complete the prequalifying unit inspection for initial inspection within 15 days of the PHA receiving a written request for prequalifying unit inspection.</b></p> <p><b>In order for the prequalifying unit inspection to serve as the initial unit inspection, the prequalifying unit inspection must have an HQS pass date that is no greater than 90 calendar days from the receipt of the Request for Tenancy Approval.</b></p> <p><b>The PHA may offer up to two reinspections for a prequalifying unit inspection.</b></p> <p><i>Vacant Units with No Attached RTA</i></p> <p><b>For prequalifying unit inspections, the PHA will inspect one-bedroom units and smaller with the assumption that no children under the age of six will reside in the unit.</b></p>		<p>permissible. Facilitates sooner subsidy start dates for participants because the units will already have passed inspection.</p>

Section	Current Policy	Proposed Policy	Required Change	Impact
		<p>For prequalifying unit inspections of units with two or more bedrooms, the PHA will inspect the unit with the assumption that a child under the age of six may reside in the unit.</p> <p>Prequalifying unit inspections cannot be utilized by households that are required to use portions of the unit as sleeping areas.</p> <p><i>Vacant Units with an Attached RTA</i></p> <p>Prequalifying unit inspections will be completed for vacant units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</p> <p>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</p> <p><i>Occupied Units with an Attached RTA</i></p> <p>Prequalifying unit inspections will be completed for occupied units for which an RTA has been submitted but has been unable to be approved within 5 business days of submission.</p> <p>If the RTA is not approved for an occupied unit, the prequalifying unit inspection will be voided.</p> <p>Households may utilize a pre-qualifying inspection if intending to use portions of the unit as a sleeping area.</p> <p><i>Occupied Units without an Attached RTAA</i> PHA will not complete a prequalifying inspection.</p>		

Section	Current Policy	Proposed Policy	Required Change	Impact
<b>TPS-V.F</b>	<p><u>PHA Policy</u></p> <p>The PHA will establish a higher payment standard amount for EHV. The PHA will use 120 percent of the published Fair Market Rent (FMR) as the payment standard for EHV.</p>	<p><u>PHA Policy</u></p> <p>The PHA will establish a higher payment standard amount for EHV. The PHA will use 120 percent of the published Fair Market Rent (FMR) as the payment standard for EHV.</p> <p><b><u>MTW Policy</u></b>  <b>Using its MTW authority, Homes for Good may establish exception payment standards for reasonable accommodations without requiring additional HUD-approval. Any requests for an exception payment standard based on reasonable accommodation will follow the PHA's reasonable accommodation approval process.</b></p>	No	<p>Allows Homes for Good to approve the request instead of having HUD Headquarters in Washington D.C. approve the request. In turn, this will reduce Administrative burden and the time it takes to approve housing for families.</p>