

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMISSIONS AND CONTINUED OCCUPANCY POLICIES (ACOP) FISCAL YEAR 2020
EFFECTIVE DATE 10-1-19 TO 9-30-20**

HIGHLIGHTS:

Chapter 3: Other Permitted Reasons for Denial of Admission

Criminal activity screening reduced from 5 years to 3 years to increase access to affordable housing

Chapter 4: Applications, Waiting List, and Tenant Selection

Modifications to Local Preferences to expand housing opportunities and clarify current agency policies

Chapter 6: Income and Subsidy Determinations

Language added to the IRS 502 to provide clarity regarding expenses for assistance animals

Modification to utility allowance implementation date to ensure no interim increases

Chapter 9: Reexaminations

Updated language to clarify how often third-party verification of non-fixed income will be obtained

Modification to transfer language to allow for reexamination at transfer and to change reexamination date

Adjustments of reporting timelines to align with other reporting requirements

Section	Previous Policy	Proposed Policy	Required Change	Impact
1-II.E.	List of Homes for Good PUBLIC HOUSING DEVELOPMENTS	Pages removed	No	Accurate information is located on the website, removes duplicate maintenance
3-I.M.	Homes for Good will typically provide the family a form to request a live in aide. The family's request for a live-in aide may be made either orally or in writing. Homes for Good will verify the need for a live-in aide with a qualified professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family may be required to submit a new, written request—subject to Homes for Good verification—at the time of the annual reexamination.	Homes for Good will typically provide the family a form to request a live in aide. The family's request for a live-in aide may be made either orally or in writing. Homes for Good will verify the need for a live-in aide, if necessary , with a qualified professional as provided by the family, such as a doctor, social worker, or case worker. For continued approval, the family may be required to submit a new, written request—subject to Homes for Good verification—at the time of the annual reexamination.	No	Allows flexibility in determining the need for a live-in aide

Section	Previous Policy	Proposed Policy	Required Change	Impact
3-III.	Homes for Good will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if HASCA is able to verify that the household member who engaged in the criminal activity has successfully completed a supervised drug rehabilitation program approved by HASCA , or the person who committed the crime is no longer living in the household.	Homes for Good will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has successfully completed a supervised drug rehabilitation program approved by the PHA , or the person who committed the crime is no longer living in the household.	No	Corrected a typo and removed reference to the agency's former name
3-III.C.	Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 5 years.	Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 3 years.	No	Increases access to affordable housing

<p>4-III.B.</p>	<p>The PHA will use the following local preference system:</p> <p>The following preferences are both worth 10 points. An applicant who qualifies for one of the preferences below, will need to complete a new application and will receive the 10 preference points. If the applicant qualifies for both preferences they will receive only 10 points.</p> <p>Victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by Homes for Good, (currently Abbie Lane, Fourteen Pines, and Village Oaks) or holding a Housing Choice Voucher issued by Homes for Good, whose situation requires moving out of the current unit.</p> <p>Persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by Homes for Good, or holding a Housing Choice Voucher</p>	<p>The PHA will use the following local preference system:</p> <p>Permanent Housed Family Preference</p> <p>This preference applies to families that are currently served in other permanent housing assistance programs administered by Homes for Good, when the other program is unable to serve the family and when such assistance is necessary for Homes for Good to appropriately house the family. This preference requires approval of Directors of both programs. This preference is worth 10 points.</p> <p>Transitional Homeless Family Preference</p> <p>This preference applies to transitional housing persons who are homeless and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity. This preference is worth 5 points. A list of partner agencies can be</p>	<p>No</p>	<p>Allows tenants to move between programs to be appropriately housed</p>
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	<p>issued by Homes for Good, who cannot be reasonably accommodated in those properties.</p> <p>Homes for Good will apply a waiting list preference worth 5 points for applicants referred by an agency with whom the Homes for Good Property Management Division has a signed Memorandum of Understanding (MOU) outlining such a preference. The preference will be specific to the properties and agencies covered by the MOU. A list of partner agencies can be found on the Homes for Good website at homesforgood.org.</p>	<p>found on the Homes for Good website at homesforgood.org</p>		

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6-II.D.	<p>The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determine the costs that qualify as medical expenses. In addition to costs allowed by the IRS, Homes for Good will allow all necessary costs incurred for service and assistance animals. Homes for Good will also allow non-prescription medicines when recommended by a medical practitioner, as treatment for a specific condition diagnosed by a physician, as an allowable medical expense.</p>	<p>The most current IRS Publication 502, Medical and Dental Expenses, will be used as a reference to determine the costs that qualify as medical expenses. In addition to costs allowed by the IRS Homes for Good will allow all necessary costs incurred for service and assistance animals. Such costs include food, grooming, and veterinary care, incurred in maintaining the health and vitality of the service or assistance animal so that it may perform its duties.</p>	No	Clarifies agency policy
6-II.E.	<p>The cost of animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.</p>	<p>The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.</p>	No	Clarifies agency policy

Section	Previous Policy	Proposed Policy	Required Change	Impact
6-III.C.	Unless Homes for Good is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first interim or annual reexamination after the allowance is adopted.	Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination that is effective after the allowance is adopted.	No	Ensures no interim increases in rent, if a new utility allowance is lower than the previous year's
7-I.D.	Homes for Good will send third-party verification forms directly to the third party.	Homes for Good may send third-party verification forms directly to the third party.	No	Allows tenants to collect third party verification in situations where third parties will not communicate with Homes for Good

<p>7-II.H.</p>	<p>Homes for Good offers a preference for victims of domestic violence, dating violence, sexual assault or stalking living in Section 8 properties managed by Homes for Good, (currently Abbie Lane, Fourteen Pines, and Village Oaks) or holding a Housing Choice Voucher issued by Homes for Good, whose situation requires moving out of the current unit – as described in Section 4-III.B. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-VII.D.</p> <p>Homes for Good also offers a preference for persons with disabilities needing an accessible unit or a reasonable accommodation living in Section 8 properties managed by Homes for Good, or holding a Housing Choice Voucher issued by Homes for Good, who cannot be reasonably accommodated in those properties. To verify that applicants qualify for the preference, Homes for Good will follow</p>	<p>Permanent Housed Family Preference</p> <p>This preference applies to families that are currently served in other permanent housing assistance programs administered by Homes for Good, when the other program is unable to serve the family and when such assistance is necessary for Homes for Good to appropriately house the family. This preference requires approval of Directors of both programs. This preference is worth 10 points.</p> <p>Transitional Homeless Family Preference</p> <p>This preference applies to transitional housing persons who are homeless and who are referred from a Homes for Good approved entity (an entity with an active MOU/MOA with Homes for Good). The definition of 'homeless' and 'transitional' for this purpose will be included in the MOU/MOA with the qualified entity. This preference is worth 5 points. A list of partner agencies can be found on the Homes for Good website at homesforgood.org</p>	<p>No</p>	<p>Allows tenants to move between programs to be appropriately housed</p>
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	documentation requirements outlined in Homes for Good's reasonable accommodation policy.			
9-I.B	Third-party verification of fixed sources of income will be obtained during the intake process and at least once every three years thereafter.	Third-party verification of fixed sources of income will be obtained during the intake process and annually . Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.	No	Provides clarity on verifying income annually
9-I.C.	If the family transfers to a new unit, Homes for Good will process the transfer as an "Other Change of Unit", but a full reexamination will not be conducted, and the anniversary date will not be changed. If the family experiences a change in income or expenses that are applicable to Homes for Good's interim policy, Homes for Good will process an interim reexamination.	If the family transfers to a new unit, Homes for Good will process the transfer as an "Other Change of Unit," a full reexamination will be conducted, and the anniversary date will be changed.	No	Ensures accurate income and family composition information when a family transfers

Section	Previous Policy	Proposed Policy	Required Change	Impact
9-III.C.	Families are required to report all increases in income, including new employment, within 30 calendar days of the date the change takes effect.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next Annual Recertification.	No	Remove reporting requirements to align with no interim ups

<p>16-V.B.</p>	<p>During the term of each public housing tenancy, and for at least three years thereafter, the PHA will keep all documents related to a family's eligibility, tenancy, and termination.</p> <p>In addition, the PHA will keep the following records for at least three years:</p> <p>An application from each ineligible family and notice that the applicant is not eligible</p> <p>Lead-based paint records as required by 24 CFR 35, Subpart B</p> <p>Documentation supporting the establishment of flat rents and the public housing maximum rent</p> <p>Documentation supporting the establishment of utility allowances and surcharges</p> <p>Documentation related to PHAS</p> <p>Accounts and other records supporting PHA budget and financial statements for the program</p>	<p>During the term of each assisted lease, and for at least three years thereafter, the PHA must keep:</p> <ul style="list-style-type: none"> • A copy of the executed lease • The application from the family • All documents related to termination of tenancy and/or subsidy <p>In addition, the PHA must keep the following records for at least three years:</p> <ul style="list-style-type: none"> • Records that provide income, racial, ethnic, gender, and disability status data on program applicants and participants • An application from each ineligible family and notice that the applicant is not eligible • HUD-required reports • Lead-based paint records as required by 24 CFR 35, Subpart B • Documentation supporting the establishment of flat rents and the public housing maximum rent 	<p>No</p>	<p>Clarifies agency policy</p>
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Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule</p> <p>Other records as determined by the PHA or as required by HUD</p>	<ul style="list-style-type: none"> • Documentation supporting the establishment of utility allowances and surcharges • Documentation related to PHAS • Accounts and other records supporting PHA budget and financial statements for the program • Complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule • Other records specified by HUD 		

Section	Previous Policy	Proposed Policy	Required Change	Impact
14-III.C.	Homes for Good is located in a HUD-declared due process state. Therefore, Homes for Good will not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, or for violent or drug-related criminal activity on or off the premises.	Homes for Good is located in a HUD-declared due process state. Therefore, Homes for Good may not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, for violent or drug-related criminal activity on or off the premises, or any criminal activity that resulted in felony conviction of a household member.	No	Increase property safety and allows more flexibility on a case-by-case basis
15-I.C.	For each investigation the PHomes for Good will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.	For each investigation the Homes for Good will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.	No	Fixed typo