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## KEY MODIFICATIONS TO THE HOMES FOR GOOD RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2021 EFFECTIVE DATE 10-1-2020 TO 9-30-2021

## PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

Chapter 4: Applications, Waiting List, and Tenant Selection

Chapter 6: Income and Subsidy Determinations

Chapter 7: Verification

Chapter 9: General Leasing Policies

Chapter 10: Moving with Continued Assistance and Portability

Chapter 11: Reexaminations

Chapter 14: Program Integrity

Chapter 16: Program Administration

## KEY MODIFICATIONS TO THE HOMES FOR GOOD ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN) PROPOSED EFFECTIVE DATE 10-1-2020

Section	Previous Policy	Proposed Policy	Required Change	Impact
4-II.F.	(Regarding removal from the waitlist) The family's response must be in writing and may be delivered in person, by mail or by fax.	(Regarding removal from the waitlist) The family's response must be in writing and may be delivered in person, by mail, <b>email</b> or by fax.	No	Allows for an additional method for communicating with Homes for Good.
4-III.C.	None	An Approved Entity with higher preference points will be indicated in the MOU and on Homes for Good's website. Unless otherwise noted all Local Preferences will be weighted the same.	No	Allows Homes for Good to meet the housing needs of various hard to house populations.
4-III.C.	Non-Elderly Persons with Disabilities Preference (limited to 33 families utilizing a Mainstream Voucher).	Non-Elderly Persons with Disabilities Preference	Yes	Allows an applicant on the waitlist who meets the qualifications of a Mainstream voucher to access one in order of placement on the waitlist.
6-I.M.	None	Distributions from an ABLE account, and actual or imputed interest on the ABLE Account balance	Yes	A source of income that is excluded. Allows disabled persons to save money in dedicated ABLE Account and not affect Federal Benefits, such as SSI, SSDI, Medicaid, and Housing Assistance. If a program participant provides proof, they have an ABLE Account, the funds in the account will not be counted as income and the interest earned will not be counted as income from an asset.
7-I. B	Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.	Documents must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.	No	Provides clarification as to what can be used for verification.

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	Print-outs from Web pages are considered original documents.  The PHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed and sign the copy.  Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or notary public.	If the PHA staff member views the original document makes a photocopy, staff must annotate the copy with the name of the person who provided the document and the date the original was viewed and sign the copy.  Any family self-certifications must be made in a format acceptable to the PHA and may be signed in the presence of a PHA representative or notary public.		
7-I.C.	The PHA will obtain income reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.  Income reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C and in this chapter.  Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.  Income reports will be retained in participant files with the applicable annual or interim reexamination documents.  When the PHA determines through income reports and third-party verification that a family has concealed or under reported income, corrective action will be taken	The PHA will obtain income <b>and IVT</b> reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.  Income <b>and IVT</b> reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C and in this chapter.  Income <b>and IVT</b> reports will be used in interim reexaminations triggered by income or family composition changes to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.	Yes	Provides PHA with a notification of discrepancy regarding families' reported sources of income.

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	pursuant to the policies in Chapter 14, Program Integrity.	Income <b>and IVT</b> reports will be retained in participant files with the applicable annual or interim reexamination documents.		
		When the PHA determines through <b>EIV</b> reports and third-party verification that a family has concealed or under reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.		
7-II.A.	If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed in the presence of a PHA representative or PHA notary public.	If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and <b>may</b> be signed in the presence of a PHA representative or PHA notary public.	No	Allows flexibility for PHA and Tenants or Applicants to verify identity
9-I.A.	The PHA will not screen applicants for family behavior or suitability for tenancy.  The PHA will not provide additional screening information to the owner.	The PHA will not screen applicants for family behavior or suitability for tenancy.  The PHA will not provide additional screening information to the owner.  The PHA will provide requested documentation regarding the subsidized unit address, length of subsidy at said address, and type of voucher to Oregon Housing and Community Services (OHCS) when OHCS is requesting such information in regard to utilization of the Landlord Guarantee Program within the state of Oregon.	No	Allows PHA to provide information to OHCS regarding claims of damage at subsidized unit.
10-I.C.	None	If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit to which the family requests to move, the PHA may enter into a HAP contract on behalf of the family for the new unit.	Yes	Clarifies that a PHA must issue a voucher to a zero HAP family.

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11- II.C.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the Next Annual Recertification.	Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the Next Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam).	No	Clarifies when a tenant needs to report changes in income.
14- II.C.	None	Committing sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2.  Retaliating against any applicant or participant reporting/alleging sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2.	No	Adheres to best practice policies defined by Nan McKay, an industry expert in PHA regulations and policy. Clarifies evidence of program owner abuse.
16- VII.C.	The public health department(s) has stated they do not wish to receive a report of an updated list of the addresses of units receiving assistance under the HCV program, on a quarterly basis. Therefore, the PHA is not providing such a report.	The Oregon Health Authority has stated they do wish to receive a report of an updated list of the addresses of units receiving assistance under the HCV program, on a quarterly basis. Therefore, the PHA is providing such a report.	Yes	PHA is able to detect children who may be impacted by elevated blood lead levels and take appropriate action with the property owner.