Matrix of Significant Changes to PHA Administrative Plan

The following Matrix contains significant changes based on regulatory requirements, recommended policy change or updates. This document has been created to identify major policies changes that have been established in the Housing Authority’s proposed administrative plan that is anticipated to take effect May 1, 2020.

The 45-day comment period will begin on March 2, 2020.

All language related to the number of calendar days have been updated from 14 and 15 calendar days to 10 business days this will account for any holiday, which fall on a business day.

Color-codes for changes in Admin. Plan and Matrix:

**YELLOW** = Regulatory

**RED/PINK** = Proposed/Update policy for Missing Language change

<table>
<thead>
<tr>
<th>Chapter</th>
<th>NEW Policy</th>
<th>Previous Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.I.D</td>
<td>MHA’s Programs:</td>
<td>□ Shelter Plus Care</td>
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<tr>
<td></td>
<td>Removed FSS</td>
<td>□ Family Self-Sufficiency</td>
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<tr>
<td></td>
<td>The following programs are included under this administrative plan:</td>
<td>□ Homeownership</td>
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<tr>
<td></td>
<td><strong>MHA Policy</strong></td>
<td>□ Shared Housing</td>
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<td></td>
<td>MHA’s administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition, the administrative plan addresses policies for the following special programs;</td>
<td>□ Cooperative housing (excluding families that are not cooperative members)</td>
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<tr>
<td></td>
<td>□□Shelter Plus Care</td>
<td>□ Group homes</td>
</tr>
<tr>
<td></td>
<td>□□Homeownership</td>
<td></td>
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<tr>
<td></td>
<td>□□Shared Housing</td>
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<tr>
<td>Chapter two</td>
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</tbody>
</table>
| 2.I.A | Overview  
MHA Policy  
The following state or local nondiscrimination laws or ordinances apply. (MUST LIST THE STATE AND LOCAL LAWS Obtain the California fair housing laws and ordinances in Marin) |
| Non discrimination | Add the additional state or local laws (protected classes)  
Add those that are not cover under federal laws. |
| 2.I.B | The PHA does not identify any additional protected classes.  
Add the additional state or local laws (protected classes) Add those that are not cover under federal laws. |
| 2.II.C | The PHA will encourage the family to make its request in writing using a reasonable accommodation request form but will accept a request if made orally. The PHA will consider the accommodation any time the family indicates that |

- Cooperative housing (excluding families that are not cooperative members)
- Group homes
- Congregate housing
- Single room occupancy (SRO)
- Mainstream Vouchers
- VASH
- HOPWA
- Family Unification Program (including Foster Age Youth Program)

- Congregate housing
- Single room occupancy (SRO)
an accommodation is needed whether or not a formal written request is submitted.

<table>
<thead>
<tr>
<th>Chapter 3</th>
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</table>
| **3.I.B** | **Delete the following language**  
When the family is housed from the waiting list, at least one member from the initial application must be a part of the household. This may include any updates made to the application due to child birth, adoption, or court awarded custody |
| **3.I.F** | **Joint custody of Dependents**  
Added School records language to policy. |
| **3.I.J** | **Updated the number of consecutive and cumulative days.**  
*MHA Policy*  
A guest can remain in the assisted unit no longer than 14 consecutive days or a total of 30 cumulative calendar days during any 12-month period.  
*MHA Policy*  
A guest can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period. |
| 3.I.I | Absences Due to Placement in Foster Care [24 CFR 5.403] | Removed language: | NOTE: For the first 12-months that a child is absent from the house due to being placed in foster care, MHA will count the child as temporarily away, this period will not exceed 12-months. If longer period is required MHA will need written recommendation from the appropriate agency (examples dependency attorney, social service agency or participant family court records) and from the HCV Program Manager, this extended period of time shall not be greater than 18 months to be considered as temporarily away. If the time period is to be greater than 18 months from the date of the removal of the child/ren, the voucher size will be reduced to the appropriate size for the remaining family members. If any children are removed from the home permanently (less than 51% custody), the voucher size will be reduced in accordance with MHA’s subsidy standards. |
| 3.II.E | | Independent Student (Expanded the language for independent student.) MHA Policy | Independent Student MHA Policy
The PHA will consider a student “independent” from his or her parents and the parents’ income will not be considered when determining the student’s eligibility if the following four criteria are all met:

The individual is of legal contract age under state law.

The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student.

The individual is of legal contract age under state law.

The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student. |
To be considered an *independent student* according to the Department of Education, a student must meet one or more of the following criteria:

- Be at least 24 years old by December 31 of the award year for which aid is sought
- Be a ward of the court through the age of 18
- Be a veteran of the U.S. Armed Forces
- Have one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)
- Be a graduate or professional student
- Be married

The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations, as demonstrated on the parents’ most recent tax forms.

The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

<table>
<thead>
<tr>
<th><strong>The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supported by:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>A local educational agency homeless liaison</td>
</tr>
<tr>
<td>The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director</td>
</tr>
<tr>
<td>A financial aid administrator the individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.</td>
</tr>
</tbody>
</table>
| 3.II.E | Add vulnerable youth definition (see highlighted)  
**CITATION FR: 9/21/16**  
**Vulnerable Youth**  
**MHA Policy**  

A *vulnerable youth* is an individual who meets the U.S. Department of Education’s definition of *independent student* in paragraphs (b), (c), or (h), as adopted in Section II of FR Notice 9/21/16:  

The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older the individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s state of legal residence  

The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:  

- A local educational agency homeless liaison  
- The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director  
- A financial aid administrator  

| 3.III.B | Removed language for definition of pattern.  

| Current plan: | Missing vulnerable youth language  

<p>| Current plan: | MHA definition of a pattern is: |</p>
<table>
<thead>
<tr>
<th>3.III.C</th>
<th>Remove language:</th>
<th><strong>Pattern</strong> has been established with two or more incidents have occurred within the previous twelve months.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Remove language:</td>
<td>Current plan: <em>Criminal activity</em> that has any of the following elements, including, but not limited to fraud, embezzlement, stalking, perjury and larceny. <em>Felonious criminal activity</em> refers to any activity that is classify as a felony under Federal, State and/or Local laws. <em>Criminal sexual conduct</em> including but not limited to sexual assault, incest, open and gross lewdness, or child abuse and/or child molestation.</td>
<td></td>
</tr>
<tr>
<td>Remove language:</td>
<td><strong>MHA Policy</strong>: A household member who is currently under supervised probation or parole will be denied assistance unless he/she will present evidence of full compliance with terms or arraignment.</td>
<td></td>
</tr>
<tr>
<td>Change criminal activity language to within the past 3 years</td>
<td>Current plan: criminal activity within past 5 years.</td>
<td></td>
</tr>
<tr>
<td>Redundant - Removal of language: Description of regulation covers this language as follows:</td>
<td>Current Plan: MHA will not deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program.</td>
<td></td>
</tr>
</tbody>
</table>

**General Counsel guidance April 4, 2016 Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions**

See page 5-7 section B; paragraph (1); (2) [https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF](https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF)**
<table>
<thead>
<tr>
<th>Previous Behavior in Assisted Housing [24 CFR 982.552(c)]</th>
<th></th>
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<tbody>
<tr>
<td>HUD authorizes the PHA to deny assistance based on the family’s previous behavior in assisted housing. Per the alternative requirements listed in the Federal Register 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].</td>
<td>Current Plan: Any PHA has ever terminated assistance under the program for any member of the family.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Previous Behavior in Assisted Housing [24 CFR 982.552(c)]</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Change: Any PHA terminated assistance under the program for any member of the family in the past 3 years.</td>
<td>Remove: Local law enforcement: added current reporting agency: (NCR) National Credit Reporting. Current plan: MHA will perform a criminal background check through local law enforcement for every adult household member. Criminal Background may include fingerprints card for each adult in the family. If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, MHA may request a fingerprint card and will request information from the National Crime Information center (NCIC).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Remove: Local law enforcement: added current reporting agency: (NCR) National Credit Reporting.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Removed: 2nd paragraph</td>
</tr>
</tbody>
</table>

| 3.III.D – Admission | Add the Jru Sjodin National Sex offender database to screen for applicants for admission and participants (Add to Chapter 11 for participants.) | Current Plan: Language is not available. |

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<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>Add language: While a record of arrest(s) will not be used as the basis for denial, an arrest may, however, trigger an</td>
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<tr>
<td>3.III.G</td>
<td>Added VAWA self-certification form HUD 5382 and additional language under notification: While the PHA is not required to identify whether adverse factors that resulted in the applicant’s denial are a result of domestic violence, dating violence, sexual assault, or stalking, the applicant may inform the PHA that their status as a victim is directly related to the grounds for the denial. The PHA will request that the applicant provide enough information to the PHA to allow the PHA to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim.</td>
<td>MHA Policy: Missing a copy of the form HUD – 5382 (Self certification form) and additional VAWA language under “notification section.”</td>
</tr>
<tr>
<td>4.1.b</td>
<td>Add reasonable accommodation language Families may also request – by telephone or by mail – which an application be mailed to them via first class mail, as a reasonable accommodation for persons with disabilities.</td>
<td>Missing RA language</td>
</tr>
</tbody>
</table>
### 4.I.D

**4-I.D. PLACEMENT ON THE WAITING LIST**

**MHA Policy**

The PHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA is recorded, however applicants will be pulled from the waiting list by lottery within those preference points.

**Expanded language**

### 4.II.C

**Closing of waitlist:** Change policy 12 months

**4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]**

**Closing the Waiting List**

A PHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, the PHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

**MHA Policy**

Current plan: 24 months
The PHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 12 months for the most current applicants. Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

| 4.II.C | Reopening of waiting list | Need to add the *List of newspapers/other media where notices will be published* |
| 4.11.E | Remove added language (utilizing the Rent Cafè portal now.) | The family must complete a waiting list update form to request the addition of a new family member or other household member. MHA will only add the following household members to the application: Child birth by current household member Marriage or domestic partnership Adoption or court awarded custody Placement of foster child expected to last more than 180 days Return of household member from active duty Required Live in Aide Attendant Reasonable accommodation provided for disabled family members |
| 4.III.C | Selection methods (Preferences are significant Changes) Added 4 preferences | **Current Preferences**

#1 Involuntary Displacement (20 pts)
<table>
<thead>
<tr>
<th>#1 insufficient funding pts (30 pts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>#2 VAWA emergency transfer (25 pts)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>#3 Individuals or Families with Disabilities Who Have Successfully Participated in or Are A Current Participant in a Supportive Housing Program for Disabled Homeless Person(s):</th>
</tr>
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<tbody>
<tr>
<td>#4 Homeless</td>
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<table>
<thead>
<tr>
<th>#5 Working or Educational</th>
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<tbody>
<tr>
<td>#6 Residency</td>
</tr>
<tr>
<td>#7 Veteran</td>
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</table>

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<thead>
<tr>
<th>#8 Chronic Homelessness preference (4pts)</th>
</tr>
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<tbody>
<tr>
<td>#9 Mainstream vouchers (4 pts) (see Kimberly email attachment with language.)</td>
</tr>
</tbody>
</table>

Removed the following language for programs listed under preferences:

- VASH
- FUP (no pts.)
- S+C
- HOPWA
- PBV
- Non-elderly and disabled

<table>
<thead>
<tr>
<th>#2 Family, Elderly or Disabled Preference: (8 points)</th>
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<tbody>
<tr>
<td><strong>Preference removed from new admin plan</strong></td>
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</table>

<table>
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<tr>
<th>#3 Individuals or Families with Disabilities Who Have Successfully Participated in or Are A Current Participant in a Supportive Housing Program for Disabled Homeless Person(s): (8 points)</th>
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<tr>
<td>#7 Veteran</td>
</tr>
</tbody>
</table>
| 4.III.C | **Remove language “ORDER OF SELECTIONS**
Order of Selection
Removed 3rd paragraph from preference denial on page 4-23 | Other considerations in selection from the waiting list: Any admission mandated by court order related to desegregation of Fair Housing and Equal Opportunity will take precedence over the Preference System. Other admissions required by court order will also take precedence over the Preference System. |
| 5.I.B | **Added portal language**
Generally, the PHA will be using email via the rent café portal to notify the family but in certain circumstances a written notification by regular mail will be used | No previous language related to portal |
| 5.I.C | **Added VAWA information (see highlight)**
*Serious and repeated lease violations* will include, but not be limited to, nonpayment of rent, disturbance of neighbors, and destruction of property, living or housekeeping habits that cause damage to the unit or premises, and criminal activity. Generally, the criterion to be used will be whether the reason for the eviction was the fault of the tenant or guests. *Any incidents of, or criminal activity related to, domestic violence, dating violence, sexual assault, or stalking will not be construed as serious or repeated lease violations by the victim [24 CFR 5.2005(c)(1)].* | No previously language |
| 5.II.E | **Extensions of Voucher Term [24 CFR 982.303(b)]**
Voucher Extension (see red edits) add RA language.
No extension beyond 180 days from original issuance date; except in the case of reasonable accommodations. | No RA language |
<table>
<thead>
<tr>
<th>Chapter 6</th>
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<tbody>
<tr>
<td><strong>6.I.E</strong></td>
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<td><strong>6.I.G:</strong></td>
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<td><strong>6.I.G – con’t</strong></td>
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<tr>
<td><strong>MHA Policy</strong></td>
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<tr>
<td>The PHA will initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).</td>
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<tr>
<td>The PHA will review the passbook rate annually, in October of each year. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.</td>
</tr>
<tr>
<td>Changes to the passbook rate will take effect on January 1 following the October review.</td>
</tr>
<tr>
<td><strong>Types of Assets</strong></td>
</tr>
<tr>
<td>In determining the value of a checking account, the PHA will use the average monthly balance for the last three months.</td>
</tr>
<tr>
<td>In determining the value of a savings account, the PHA will use the current balance.</td>
</tr>
<tr>
<td>In determining the anticipated income from an interest bearing checking or savings account, the PHA will</td>
</tr>
</tbody>
</table>
multiply the value of the account by the current rate of interest paid on the account.

documentation, which is signed by all adults’ family members, can serve as a declaration. Therefore, where the family has a net family assets equal of less than $5,000, MHA will not request-supporting documentation (e.g. bank statements) from the family to confirm the assets or the amount of income expected to be received from those assets. However, MHA may request evidence at any time is necessary as verification of the amounts declare.

**Equity in Real Property or Other Capital Investments**

**MHA Policy**

In determining the equity, the PHA will determine market value by examining recent sales of at least three properties in the surrounding or similar neighborhood that possess comparable factors that affect market value.

The PHA will first use the payoff amount for the loan (mortgage) as the unpaid balance to calculate equity. If the payoff amount is not available, the PHA will use the basic loan balance information to deduct from the market value in the equity calculation.

The PHA must also deduct from the equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is the market value of the loan (mortgage) minus the expenses to convert to cash [Notice PIH 2012-3].

**MHA Policy**

For the purposes of calculating expenses to convert to cash for real property, the PHA will use ten percent of the market value of the home.
<table>
<thead>
<tr>
<th>Checking and Savings Accounts</th>
<th>Types of Assets</th>
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</thead>
<tbody>
<tr>
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<td></td>
<td>In determining the anticipated income from an interest bearing checking or savings account, the PHA will multiply the value of the account by the current rate of interest paid on the account.</td>
</tr>
</tbody>
</table>

**MHA Policy**

MHA will accept a family declaration of the amount of assets of less than $5,000, and the amount of income expected to be received from those assets. The application and reexamination documentation, which is signed by all adults’ family members, can serve as a declaration. Therefore, where the family has a net family assets equal of less than $5,000, MHA will not request-supporting documentation (e.g. bank statements) from the family to confirm the assets or the amount of income expected to be received from those assets.

However, MHA may request evidence at any time is necessary as verification of the amounts declare.
| 6.III.A | 6-III.A. OVERVIEW OF RENT AND SUBSIDY CALCULATIONS  
| TTP Formula [24 CFR 5.628] | **Utility Reimbursement** [24 CFR 982.514(b); 982.514(c)]  
When the PHA subsidy for a family exceeds the rent to owner, the family is due a utility reimbursement. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.  
**MHA Policy**  
The PHA will make utility reimbursements to the family.  
The PHA may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is $15.00 or less. Reimbursements must be made once per calendar-year quarter and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. The PHA must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship.  
**PHA Policy**  
The PHA will issue all utility reimbursements monthly. | Policy missing |
| 6.III.B | **FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]**  
**MHA Policy**  
The financial hardship rules described below apply in this jurisdiction because the PHA has established a minimum rent of $50.  

**Implementation of Hardship Exemption**  
**Determination of Hardship**  
**MHA Policy**  
To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family’s ability to pay the minimum rent. The PHA will make the determination of hardship within 30 calendar days.  

| Policy missing |  
| Changed from 15 days to 30 calendar days. |

| 7.1.B | **Remove verification hierarchy as a policy. This is a HUD rule not PHA option.**  
**MHA Policy**  
MHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process:  
**HUD’s EIV system (when it is available to MHA)**  
**Social Security database (provided by client)**  
**EDD (Employment Development Department) system**  
**The Work Number website**  
**Veteran’s Administration system**  

| Listed as a policy |  
| **MHA Policy**  
MHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process:  
**HUD’s EIV system (when it is available to MHA)**  
**Social Security database (provided by client)**  
**EDD (Employment Development Department) system**  
**The Work Number website**  
**Veteran’s Administration system** |
### Dept. of Health and Human Services database

**Child Support Services database**

| 7.1.C                                                                 | ADDED IVT POLICY UPDATE EIV AND IVT (SEE HIGHLIGHT) New mandate **EIV Income and IVT Reports**
|-----------------------------------------------------------------------|-----------------------------------------------------------------------------------
| The data shown on income and income validation tool (IVT) reports is updated quarterly. Data may be between 3 and 6 months old at the time reports are generated. | **MHA Policy**
| The PHA will obtain income and IVT reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process. Income and IVT 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 and IVT 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 and IVT reports will be retained in participant files with the applicable annual or interim reexamination documents. |
| New HUD regulation | |
When the PHA determines through EIV 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.I.D. | **Add policy for assets**  
*Value of Assets and Asset Income [24 CFR 982.516(a)]*  
For families with net assets totaling $5,000 or less, the PHA may accept the family’s declaration of asset value and anticipated asset income. However, the PHA is required to obtain third-party verification of all assets regardless of the amount during the intake process and at least every three years thereafter.  

**MHA Policy**  
For families with net assets totaling $5,000 or less, the PHA will accept the family’s self-certification of the value of family assets and anticipated asset income when applicable. The family’s declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family’s declaration.  
The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual’s assets, and every three years thereafter.  

| 7.II.B | **Social Security**  
*Added updated language (PIH 2018-24) Replaced with new policy –language*  
*Add language for retain copies of social security card in the efile/file*  

Social security numbers (language is outdated.) removed  
No language for retaining the social security card.  

Previously under 6.I.G (Incorrect location)
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.III.Da</td>
<td>Removed 7.III.Da – created by MHA and is incorrect language and citation.</td>
</tr>
<tr>
<td>7.III.E</td>
<td>Remove 7.III.E MHA insert of assets incorrect (repeated language on checking and saving accounts, duplicate insert from chapter 6)</td>
</tr>
</tbody>
</table>

### 7-III.Da. GENERAL ASSISTANCE
When the family declares that assistance from Department of Children and Family, verification will be sought in the following order.

- **MHA Policy (PIH-Notice 2013-04)**
  - When cash assistance is received and payments are made through a state or local entity, MHA will request an award letter or print out of payments.
  - If income is fully excluded like Food Stamps, MHA will not verify the income

### 7-III.E. ASSETS AND INCOME FROM ASSETS

**Checking and Savings Accounts**
For regular checking accounts and savings accounts, *cash value* has the same meaning as *market value*. If a checking account does not bear interest, the anticipated income from the account is zero.

**MHA Policy**
MHA will accept a family declaration of the amount of assets of less than $5,000, and the amount of income expected to be received from those assets. The application and reexamination documentation, which is signed by all adults’ family members, can serve as a declaration. Therefore, where the family has a net family assets equal of less than $5,000, MHA will not request supporting documentation (e.g. bank statements) from the family to confirm the assets or the amount of income expected to be received from those assets. However, MHA may request evidence at any time is necessary as verification of the amounts.
### MHA Policy

**INCOME FROM EXCLUDED SOURCES**

The PHA will accept the family’s self-certification as verification of fully excluded income. The PHA may request additional documentation if necessary to document the income source.

The PHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

**CHAPTER 8 INSPECTIONS**

**LIFE-THREATENING CONDITIONS** [24 CFR 982.404(a); FR Notice 1/18/17]

Additional hazard language (HUD definition of life-threatening)

- Missing, damaged, discharged, overcharged, or expired fire extinguisher (where required)
- Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting
- The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases
- A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside
- A fuel-fired space heater is not properly vented or lacks available combustion air
- A non-vented space heater is present

**MHA Policy**

MHA will reconcile differences in amounts reported by the third party and the family only when the excluded amount is used to calculate the family share (as is the case with the earned income disallowance). In all other cases, MHA will report the amount to be excluded as indicated on documents provided by the family.
<table>
<thead>
<tr>
<th><strong>8.11.D</strong></th>
<th><strong>Special Inspections</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Added max. # of calendar days for owner to make repairs and included the biennial inspection language:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>MHA Policy</strong></td>
<td></td>
</tr>
<tr>
<td>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 within no more than 30 calendar days.</td>
<td></td>
</tr>
<tr>
<td>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 inspection</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>8.III.D</strong></th>
<th><strong>How Market Data Is Collected</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MHA Policy</strong></td>
<td></td>
</tr>
<tr>
<td>The PHA will collect and maintain data on market rents in the PHA's jurisdiction using Go Section 8 or owner provided comparable per owner request. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. <strong>The data will be updated on an ongoing basis</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th><strong>How Market Data is Collected</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MHA Policy</strong></td>
<td></td>
</tr>
</tbody>
</table>
| MHA may contract with a third party vendor. The contractor will collect and maintain data on market rents in MHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood,
<table>
<thead>
<tr>
<th>and rent information that is more than 12 months old will not be used.</th>
<th>and identifiable natural or man-made boundaries. The contractor will be responsible to maintain data updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database, or will not be used for comparable</th>
<th>Chapter 9</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>9.1.E</strong> Term of Assisted Tenancy The initial term of the assisted dwelling lease must be for at least one year [24 CFR 982.309]. The initial lease term is also stated in the HAP contract. The HUD program regulations permit the PHA to approve a shorter initial lease term if certain conditions are met. <strong>MHA Policy</strong> The PHA will generally not approve an initial lease term of less than one (1) year. However, month to month or six (6) month terms will be approved in order to follow local market practice and to assist families in utilizing vouchers.</td>
<td><strong>MHA Policy</strong> MHA will generally not approve an initial lease term of less than one (1) year. However shorter terms can be approved by the Program Manager. Month to month or six (6) month leases may be okay under special circumstances.</td>
<td></td>
</tr>
<tr>
<td><strong>9.1.G</strong> HAP CONTRACT EXECUTION [24 CFR 982.305] <strong>MHA Policy</strong> Owners who have not previously participated in the HCV program may attend a meeting with the PHA in which the terms of the Tenancy Addendum and the HAP contract will be explained. The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the PHA. The PHA will ensure that both the owner and the assisted family receive copies of the dwelling lease. <strong>MHA Policy</strong> Owners who have not previously participated in the HCV program may attend a meeting with MHA in which the terms of the Tenancy Addendum and the HAP contract will be explained. MHA may require owners to attend this meeting on a case-by-case basis, if it determines that the owner does sufficiently understand the requirements and responsibilities under the HCV program. The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the MHA.</td>
<td></td>
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</tr>
<tr>
<td><strong>Chapter 10</strong></td>
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<td>----------------</td>
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<td></td>
</tr>
<tr>
<td><strong>10.I.A</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Add updated VAWA language</strong></td>
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</tr>
<tr>
<td>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 [24 CFR 982.354(b)(4)]. This condition applies even when the family has moved out of its unit in violation of the lease, with or without prior notification to the PHA, if the family or family member who is the victim reasonably believed that he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.354(b)(4), 24 CFR 982.353(b)]. The PHA must adopt an emergency transfer plan as required by regulations at 24 CFR 5.2007(e). <strong>MHA Policy</strong> If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the PHA based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the PHA will request that the resident request the emergency transfer using <strong>OUT DATED PREVIOUS POLICY</strong> The family or a member of the family is or has been the victim of domestic violence, dating violence, or stalking and the move is needed to protect the health or safety of the family or family member [24 CFR 982.354(b)(4)]. This condition applies even when the family has moved out of its unit in violation of the lease, with or without prior notification to the PHA, if the family or family member who is the victim reasonably believed that he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.354(b)(4), 24 CFR 982.353(b)]. <strong>MHA Policy</strong> If a family requests permission to move with continued assistance based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, or stalking, the PHA will request documentation in accordance with section 16-IX. D of this plan.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases, the PHA will document the waiver in the family’s file.

The PHA may choose to provide a voucher to facilitate an emergency transfer of the victim without first terminating the assistance of the perpetrator.

Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.

The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan and discusses external transfers to other covered housing programs.

10.I.B Insufficient Funding: MHA Policy

The PHA will deny a family permission to move on grounds that the PHA does not have sufficient funding for continued assistance if (a) the move is initiated by the family, not the owner or the PHA; (b) the PHA can demonstrate that the move will, in fact, result in higher subsidy costs; and (c) the PHA can demonstrate, in accordance with the policies in Part VIII of Chapter 16, that it does not have

MHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases, the PHA will document the waiver in the family’s file.
sufficient funding in its annual budget to accommodate the higher subsidy costs; and (d) for portability moves, the receiving PHA is not absorbing the voucher.

If the PHA does not have sufficient funding for continued assistance, but the family must move from their unit (e.g., the unit failed HQS), the family may move to a higher cost unit if the move is within the PHA’s jurisdiction. The PHA, however, will not allow the family to move under portability in this situation if the family wishes to move to a higher cost area.

For both moves within the PHA’s jurisdiction and outside under portability, the PHA will not deny a move due to insufficient funding if the PHA previously approved the move and subsequently experienced a funding shortfall if the family cannot remain in their current unit. The PHA will rescind the voucher in this situation if the family will be allowed to remain in their current unit.

The PHA will create a list of families whose moves have been denied due to insufficient funding. The PHA will keep the family’s request open indefinitely, and when funds become available, the families on this list will take precedence over families on the waiting list. The PHA will use the same procedures for notifying families with open requests to move when funds become available as it uses for notifying families on the waiting list (see section 4-III.D).

The PHA will inform the family of its policy regarding moves denied due to insufficient funding in a letter to the family at the time the move is denied.

MHA can demonstrate, in accordance with the policies in Part VIII of Chapter 16, that it does not have sufficient funding in its annual budget to accommodate the higher subsidy costs. The PHA will create a list of families whose moves have been denied due to insufficient funding. When funds become available, the families on this list will take precedence over families on the waiting list. The PHA will use the same procedures for notifying families with open requests to move when funds become available as it uses for notifying families on the waiting list (see section 4-III.D).

MHA will inform the family of its policy regarding moves denied due to insufficient funding in a letter to the family at the time the move is denied.
<table>
<thead>
<tr>
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<tbody>
<tr>
<td></td>
<td>A participant who is not receiving any subsidy, but whose</td>
</tr>
<tr>
<td></td>
<td>HAP contract is still in force, may request a voucher to</td>
</tr>
<tr>
<td></td>
<td>move to a different unit. The PHA must issue a voucher</td>
</tr>
<tr>
<td></td>
<td>to move unless it has grounds to deny assistance under</td>
</tr>
<tr>
<td></td>
<td>the program regulations. However, if the PHA determines</td>
</tr>
<tr>
<td></td>
<td>no subsidy would be paid at the new unit, the PHA may</td>
</tr>
<tr>
<td></td>
<td>refuse to enter into a HAP contract on behalf of the</td>
</tr>
<tr>
<td></td>
<td>family.</td>
</tr>
<tr>
<td></td>
<td><strong>MHA Policy</strong></td>
</tr>
<tr>
<td></td>
<td>If a zero HAP family requests to move to a new unit, the</td>
</tr>
<tr>
<td></td>
<td>family may request a voucher to move. However, if no</td>
</tr>
<tr>
<td></td>
<td>subsidy will be paid at the unit to which the family</td>
</tr>
<tr>
<td></td>
<td>requests to move, the PHA will not enter into a HAP</td>
</tr>
<tr>
<td></td>
<td>contract on behalf of the family for the new unit.</td>
</tr>
</tbody>
</table>

| No current policy | 10.II.1 | **Chapter 10 Part II - Portability** |

**Restrictions on Elective Moves [24 CFR 982.354(c)]**

**MHA Policy**

MHA will deny a family permission to make an elective move during the family’s initial lease term. This policy applies to moves within MHA’s jurisdiction or outside it under portability. MHA will also deny a family permission to make more than one elective move during any 12-month period. This policy applies to all assisted families residing in MHA’s jurisdiction.
Voucher Issuance and Term

MHA Policy

For participating families approved to move under portability, the PHA will issue a new voucher within 10 business days of the PHA’s written approval to move.

The initial term of the voucher will be 60 days. If needed, the term can be extended an additional 60 days, but not to exceed 120 days from date of issuance.

Briefing

MHA Policy

For families approved to move under portability, MHA will issue a new voucher within 15 calendar days of MHA’s written approval to move.

The initial term of the voucher will be 120 days.

Briefing

MHA Policy

MHA may require, but not necessary, the family to attend a briefing, especially when family is an applicant and has never participated in the program. MHA will provide the family with a briefing packet (as described in Chapter 5) and, in an individual briefing, will orally inform the family about MHA’s payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process.

The PHA will suggest that the family attend a full briefing at a later date.

Absorbing

Add 10 calendar days to notify IHA of intent to absorb

Missing language
<table>
<thead>
<tr>
<th>11.I.B</th>
<th>11-I.B STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(b)]</th>
<th>11.I.B and 11.I.C was combined and incorrectly worded regarding the streamline rule.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Added the correct (HUD) streamline rule language.</td>
<td>Removed language: <strong>MHA WILL conduct annual reexam every three years for fixed income families or fixed income sources.</strong> Rule: Streaming applies to household with fixed income if 90% of family household income is fixed PHA may streamline THE fixed income with a revised recert packet in the intermittent years and family may self-certify the 10% income, the annual (but short version of the</td>
</tr>
<tr>
<td></td>
<td><strong>MHA Policy</strong></td>
<td><strong>Notification of and Participation in the Annual Reexamination Process</strong> MHA is required to obtain the information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of MHA. However, MHAs should give tenants who were not provided the opportunity the option to complete Form HUD-90026 at this time [Notice PIH 2009-36].</td>
</tr>
<tr>
<td></td>
<td>The PHA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. The PHA will document in the file how the determination that a source of income was fixed was made.</td>
<td><strong>MHA Policy</strong> Annual reexaminations will be conducted by mail. Notification of the annual reexamination will be sent by first-class mail and will inform the family of the information and documentation that must be provided to MHA, and the deadline for providing it. Documents will be accepted by mail,</td>
</tr>
<tr>
<td></td>
<td>If a family member with a fixed source of income is added, the PHA will use third-party verification of all income amounts for that family member. If verification of the COLA or rate of interest is not available, the PHA will obtain third-party verification of income amounts.</td>
<td></td>
</tr>
</tbody>
</table>
### Revised language and update process using the Rent Café portal.

### Notification of and Participation in the Annual Reexamination Process

**MHA Policy**
Annual reexaminations will be conducted by mail or via the rent café portal. Notification of the annual reexamination will be sent by first-class mail and/or electronically and will inform the family of the information and documentation that must be provided to MHA, and the deadline for providing it. Documents will be accepted by mail, by fax, or in-person.

For those opting out of the portal, if the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family’s address of record, as well as to any alternate address provided in the family’s file.

Families that fail to provide the necessary documents will be sent a notice of termination in accordance with policies contained in Chapter 12.

by fax, or in-person
If the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family’s address of record, as well as to any alternate address provided in the family’s file.

Families generally are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse, or co-head. If participation in an in-person interview poses a hardship because of a family member’s disability, the family should contact the PHA to request a reasonable accommodation (see Chapter 2).

**MHA Policy**
Annual reexaminations will be conducted by mail. Notification of the annual reexamination will be sent by first-class mail and will inform the family of the information and documentation that must be provided to MHA, and the deadline for providing it. Documents will be accepted by mail, by fax, or in-person.

If the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family’s address of record, as well as to any alternate address provided in the family’s file. If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. If a
An advocate, interpreter, or other assistant may assist the family in the recertification process. The family and MHA must execute a certification attesting to the role and assistance of any such third party.

| 11-I.D | **CONDUCTING ANNUAL REEXAMINATIONS**  
As part of the annual reexamination process, families are required to provide updated information to the PHA regarding the family’s income, expenses, and composition [24 CFR 982.551(b)]. |
| --- | --- |
| **MHA Policy**  
Families will be asked to supply all required information (as described in the reexamination notice) before the deadline specified in the notice. The required information will include an MHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family’s income, expenses, and family composition. MHA will notify the family in writing if any required documentation or information is missing. The missing information will be requested. |
|  | Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a PHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documents or forms related to the family’s income, expenses, and family composition. |

If a family fails to attend two scheduled interviews without PHA approval, or if the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family’s address of record, and to any alternate address provided in the family’s file. An advocate, interpreter, or other assistant may assist the family in the interview process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any such third party.
information or documentation must be provided within 14 calendar days of the date MHA notifies the family. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be sent a notice of termination (see Chapter 12).

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (See Chapter 12).

11.II.B

Added less restrictive language to add person to household composition and revised number of days any person not on the lease can stay in the unit.

CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

New Family and Household Members Requiring Approval

Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 consecutive days or 30 cumulative days within a 12-month period and therefore no longer qualifies as a “guest.” Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

Removed policy with the restriction of who can be added to voucher.

New Family and Household Members Requiring Approval

MHA Policy

The PHA will only allow the following additional household member:

- Child birth by a current household member
- Marriage or domestic partnership
- Adoption or court awarded custody
- Placement of foster child expected to last more than 180 days
- Return of household member from active duty
- Required Live in Aide Attendant
- Reasonable accommodation provided for disabled family members
- Members over the age of 18 that are removed from household will not be allowed to be added without meeting the
above criteria or under extenuating circumstances that forced the adult member to return back.
- Extenuating circumstances can be, but not limited to: illness, divorce, homelessness, disable adult.
- Families must request MHA approval to add a new family member, live-in aide, foster child, or foster adult.

<table>
<thead>
<tr>
<th>Added Language</th>
<th>Departure of a Family or Household Member</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MHA Policy</strong></td>
<td>If a household member ceases to reside in the unit, the family must inform the PHA within 10 business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the PHA within 10 business days. Head of the household must certify that family member no longer reside in the unit. MHA may require evidence to support or verified that family member no longer reside in the unit. Documents may be, but not limited to: current lease, utility bill, proof of insurance with current address, bank accounts, any other evidence that verify the new residence.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11.I1.C</th>
<th>Changes affecting income or expenses Family-Initiated Interim Reexaminations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MHA Policy Family – Initiated Interim Reexaminations Required reporting</td>
</tr>
</tbody>
</table>
### Required Reporting

**MHA Policy**

Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect.

The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family’s share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

Families are not required to report any other changes in income or expenses.

### Optional Reporting

**MHA Policy**

If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, the PHA will conduct an interim reexamination. See Section 11-II.D. for effective dates. Families may report changes in income or expenses at any time.

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<table>
<thead>
<tr>
<th>11.II.D. Method of reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Removed language related to date the interim need to be reported.</strong> (ex. 25th of each month.)</td>
</tr>
<tr>
<td>Family share of rent to decrease;</td>
</tr>
</tbody>
</table>

Families are required to report changes that affect their tenant portion within 14 calendar days of the date the change takes effect to ensure continued program eligibility.

The PHA will only conduct interim reexaminations in the following circumstances:

- Families that qualify for the earned income disallowance (EID), and only when the EID family’s share of rent will change as a result of the increase.
- When the family’s current monthly income increases by **$200.00 or more**.
- When a family which previously reported no income obtains a source of income.
- When a family’s income decreases.
- When family composition changes

If the income decrease is less than 30-days in duration, no interim decrease will be conducted. If the income decreases for a period of longer than 30-days MHA will conduct an interim decrease. In all other cases, MHA will note the information in the tenant file, but will not conduct an interim reexamination.

Failure to report income changes would constitute a program violation and the family would be retroactively responsible for the increase in the family share of rent regardless of the source.

**Optional reporting: Missing language**

If the family share of the rent is to decrease:

The decrease will be effective on the first day of the month following the month in which
If the family share of the rent is to *decrease*:

The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.

Families who do not notify MHA within 10 business days of a decrease in their income will not be entitled to a rent adjustment retroactively to the month following the date of the decrease. If the family fails to provide all required documentation within 10 business days of reporting the income decrease, the interim reexamination is cancelled and the family must restart the interim process.

---

Chapter 12

**12.I.C Family Absence from the Unit [24 CFR 982.312]**

The family may be absent from the unit for brief periods. The PHA must establish a policy on how long the family may be absent from the assisted unit. However, the family may not be absent from the unit for a period of more than 180 consecutive calendar days for any reason. Absence in this context means that no member of the family is residing in the unit.

**MHA Policy**

If the family is absent from the unit for more than 60 consecutive calendar days, the family’s assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F.

---

**MHA Policy**

If the family is, absent from the unit for more than 180 consecutive calendar days, the family’s assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F.
| **Family choose to terminate assistance**  
**MHA Policy**  
The request to terminate assistance should be made in writing and signed by the head of household, and spouse or co-head if applicable.  
Before terminating the family’s assistance, the PHA will follow the notice requirements in Section 12-II.F.  
Add new language: ALL head, cohead and spouse AGREE to terminate the assistance |
|---|
| **12.I.E –**  
**Insufficient funding**  
**Protected groups**  
Special target program Mainstream, VASH, FUP  
**Disabled/elderly will not be terminated**  
Then the first terminated will be:  
1. Elderly and disabled families will not be terminated.  
2. Families who have received voucher assistance for the shortest period of time will be the first to be terminated and will continue to work down the list until there is a sufficient amount of HAP funding to support remaining existing vouchers.  

- MHA will determine whether there is sufficient funding to pay for currently assisted families according to the policies in Part VIII of Chapter 16. If MHA determines there is a shortage of funding, prior to terminating any HAP contracts, MHA will determine if any other actions can be taken to reduce program costs. If after implementing all reasonable cost cutting measures there is not enough funding available to provide continued assistance for current participants, MHA will terminate HAP contracts as a last resort.  
- Prior to terminating any HAP contracts, MHA will inform the local HUD field office. MHA will terminate the minimum number needed in order to reduce HAP costs to a level within MHA’s annual budget authority. |
<table>
<thead>
<tr>
<th></th>
<th>If MHA must terminate HAP contracts due to insufficient funding, MHA will do so in accordance with the following criteria and instructions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>MHA’s Chief Financial Officer will review the HCV’s calendar year funding (i.e., utilization tracking spreadsheet, P &amp; L’s, etc.) with Deputy Director and the Chief Financial Officer.</td>
</tr>
<tr>
<td>2.</td>
<td>MHA will notify the Region VII HUD financial analyst’s office at least 5 months in advance of this shortfall and get direction.</td>
</tr>
<tr>
<td>3.</td>
<td>MHA will then follow any direction received by the Region VII HUD office.</td>
</tr>
<tr>
<td>4.</td>
<td>This policy will protect and exclude the elderly and disabled HOH, spouse or co-head tenants from this termination process.</td>
</tr>
<tr>
<td>5.</td>
<td>MHA will run the HAP payments and will terminate existing HCV tenants based on the following criteria,</td>
</tr>
<tr>
<td></td>
<td>a. Families who are not currently under a contract will be terminated. Families or individuals who are searching and have an unsigned contract will be the first terminated.</td>
</tr>
</tbody>
</table>
• b. First, families that have committed fraud and/or under repayment agreement and not paying

• c. Second criteria, HCV tenants who have the least HAP subsidy being paid out, then,

• d. Third criteria, tenants who have received the benefit for the longest period of time, based on their initial move-in date.

• i. Elderly and disabled families will not be terminated

• e. MHA will continue working down the HAP subsidy list until we establish that we have adequate HAP assistance funding to cover the remaining HCV vouchers.

• 6. This group of tenants will then be sent a written notification as soon as possible (at least 30 days in advance) explaining that there is inadequate Housing Assistance funding to continue their assistance, which is due to the “type of condition” (i.e., loss of funding, economic downturn, etc.) and the effective date that the termination of housing assistance will begin; and

7. The written notification will also include this item: “All Housing Choice Voucher tenants that have been terminated under this policy shall have their name automatically returned to the
MHA waiting list and be given the maximum preference points, for being displaced due to a government action. This will ensure that as “new” vouchers are issued in the future, this group of terminated HCV tenants will have the opportunity to be served first off the HCV waiting list, thus not having to go through an additional waiting period.

<table>
<thead>
<tr>
<th>12.II.D</th>
<th>Consideration of circumstances</th>
<th>Language Missing from current policy (hud requirement)</th>
</tr>
</thead>
</table>
| **Consideration of Circumstances [24 CFR 982.552(c)(2)(i)]** | The PHA is permitted, but not required, to consider all relevant circumstances when determining whether a family’s assistance should be terminated.  
**MHA Policy**  
The PHA will consider the following facts and circumstances when making its decision to terminate assistance:  
While a record of arrest(s) will not be used as the basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:  
Any statements made by witnesses or the participant not included in the police report  
Whether criminal charges were filed  
Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal  
Any other evidence relevant to determining whether or not the participant engaged in disqualifying activity |  
| Exhibit 12-1 | Statement of family obligations | Removed |
If the family misses two scheduled inspections without PHA approval, or does not allow inspections the PHA will consider the family to have violated its obligation to make the unit available for inspection. This will result in termination of the family’s assistance.

Added per HUD:

**MHA Policy**
The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner’s notice to evict, police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge.

**MHA Policy**
The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The PHA will determine eligibility of the new member in accordance with the policies in Chapter 3.

When the PHA has evidence that an unauthorized person is living in the unit the PHA will consider that the family has violated the family obligations and will terminate assistance. Evidence will be considered but not limited to landlord verification, US Postal Verification, Inspector Findings, Written Complaints supported by further evidence or witnesses.

---

**Chapter 13**

<table>
<thead>
<tr>
<th>13-II.F.</th>
<th>CHANGE IN OWNERSHIP / ASSIGNMENT OF THE HAP CONTRACT [HUD-52641]</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Removed language</td>
</tr>
</tbody>
</table>

Within 10 business days of receiving the owner’s request, the PHA will inform the current owner in writing whether the assignment may take place.
### Chapter 14 Program Integrity

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
</table>
| 14.I.A  | **PREVENTING ERRORS AND PROGRAM ABUSE**  
**MHA Policy**  
The PHA may require first-time owners (or their agents) to participate in a briefing session on HAP contract requirements. |
|         | The PHA will require first-time owners (or their agents) to participate in a briefing session on HAP contract requirements. |
| 14.II.C | Prohibited Owner actions: add 2 bullets to actions  
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 previous language |

### Chapter 15

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
</table>
| Introduction | **SPECIAL HOUSING TYPES**  
**MHA Policy**  
Families will be permitted to use any special housing types. |
|         | **MHA Policy**  
Families will not be permitted to use any special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities. |

### Chapter 16

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
</table>
| 16.II.B | **Updating Payment Standards**  
**MHA Policy**  
Changes to payment standard amounts will be effective every year after the final FMRs are published on an effective date that minimizes the |
<p>|         | On January 1st of every year, or within three months of the FMR effective date, whichever is earlier. The effective date is |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.II.C</td>
<td>Air condition&lt;br&gt;&lt;<strong>MHA Policy</strong>&lt;br&gt;The PHA has included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner must be present in a unit before the PHA will apply this allowance to a family’s rent and subsidy calculations.</td>
</tr>
<tr>
<td>Missing language</td>
<td></td>
</tr>
</tbody>
</table>
| Informal Hearing Officer [24 CFR 982.555(e)(4)] | **MHA Policy**<br>The PHA has designated the following to serve as hearing officers:<br>*The hearing officer may be any current employee other than the person who made or approved the decision or a subordinate of the person who made or approved the decision, or any MHA Management Staff, Legal Consultant or a Contractor from other PHA.*
| **MHA Policy**<br>The hearing officer may be any current employee other than the person who made or approved the decision or a subordinate of the person who made or approved the decision, or any MHA Management Staff, Legal Consultant or a Contractor from other PHA.  
- **Staff** |
| Rehearing | **Procedures for Rehearing or Further Hearing**<br><**MHA Policy**<br>The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by |
| These are procedures not a policy need to remove. |
| **MHA Policy**<br>The hearing officer may ask the family for additional information and/or might adjourn the hearing |
the hearing officer, the action of the PHA will take effect and another hearing will not be granted.

in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of MHA will take effect and another hearing will not be granted. In addition, within 15 calendar days after the date the hearing officer’s report is mailed to MHA and the participant, MHA or the participant may request a rehearing or a further hearing. Such request must be made in writing and postmarked or hand-delivered to the hearing officer and to the other party within the 10 business day period. The request must demonstrate cause, supported by specific references to the hearing officer’s report, why the request should be granted. A rehearing or a further hearing may be requested for the purpose of rectifying any obvious mistake of law made during the hearing or any obvious injustice not known at the time of the hearing. The only grounds on which an appeal will be granted are:

☐ There was a violation of the process outlined in this procedure, or
☐ The decision is not supported by the findings, or
☐ The findings are not supported by the evidence

It shall be within the sole discretion of MHA to grant or deny the request for further hearing or rehearing. A further hearing may be limited to written submissions by the parties, in the manner specified by the hearing officer. The following evidence will be considered:

☐ The tape recording or written notes of the grievance procedure,
☐ All documents that were presented at the hearing,
Either or both parties may present a written brief to the Appellate Officer outlining why the decision should or should not be overturned.

- All documents and briefs must be presented to the officer within 14 calendar days of notification that the case will be reviewed.

The Appellate Officer will have 15 calendar days to review the case and render a written decision, which shall consist of the following:

- The name of the parties, and
- A brief description of the issues on appeal,
- The decision of the Appellate Officer, and
- The reason for the decision, and
- A description of the Participant's right to seek other legal remedies.

The results of the hearing on the appeal do not in any way preclude the Participant from proceeding with any other legal remedies that may be open to him/her.

### Effect of Final Decision [24 CFR 982.555(f)]

<table>
<thead>
<tr>
<th>Add language see highlight MHA Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Executive Director has the authority to determine that the PHA is not bound by the decision of the hearing officer because the PHA was not required to provide a hearing, the decision exceeded the authority of the hearing officer, the decision conflicted with or contradicted HUD regulations, requirements, or the decision was otherwise contrary to federal, state, or local laws. In such a case, the PHA will mail a “Notice of Final Decision” to the PHA and the participant on the same day. The “Notice of Final Decision” will be sent by first-</td>
</tr>
<tr>
<td>Missing language</td>
</tr>
<tr>
<td>Missing 2nd paragraph</td>
</tr>
<tr>
<td>Class Mail. A copy of this notice will be maintained in the PHA’s file.</td>
</tr>
<tr>
<td>---</td>
</tr>
</tbody>
</table>

**No Offer of Repayment Agreement**

**MHA Policy**

The PHA generally will not enter into a repayment agreement with a family or owner if there is already a repayment agreement in place with the family or owner or the amounts owed by the family or owner exceed $20,001 to be referred for Federal or State criminal prosecution.

**MHA Policy**

The PHA generally will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution.

<table>
<thead>
<tr>
<th>16.VII.B Reporting Requirement [24 CFR 35.1225(e); Notice PIH 2017-13]</th>
</tr>
</thead>
</table>

**Missing from previous policy**

Upon notification by the owner, the PHA will notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child’s address within five business days.

| --- |

**Aligned policy with regulations**

**MHA Policy**

The PHA will provide all applicants with information about VAWA in all notices of denial of assistance (see section 3-III.G).

The PHA will provide all participants with information about VAWA at the time of admission (see section 5-I.B). The PHA will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

**MHA Policy**

The PHA will provide all applicants with information about VAWA at the time they request an application for housing assistance, as part of the written briefing packet, and at the time the family is admitted to the program. The PHA will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

The PHA will provide all participants with information about VAWA at the time of admission (see section 5-I.B) and at annual reexamination. The PHA will...
notices of termination of assistance, as provided in section 12-II.F.

The VAWA information provided to applicants and participants will consist of the notices in Exhibits 16-1 and 16-2.

**ADDED VAWA Language**

The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the PHA make alternative delivery arrangements that will not put the victim at risk.

**MHA Policy**

Whenever the PHA has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim’s unit if the PHA believes the perpetrator may have access to the victim’s mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room.
The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

**Notification to Owners and Managers**
While PHAs are no longer required by regulation to notify owners and managers participating in the HCV program of their rights and obligations under VAWA, the PHA may still choose to inform them.

**MHA Policy**
The PHA will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the program. The VAWA information provided to owners will consist of the information provided in the HUD Tenancy Addendum and HAP Contract and the Notification to Owners on VAWA.

**Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]**
The PHA has the discretion to provide benefits to an individual based solely on the individual’s statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

**MHA Policy**
The PHA will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the program and at least annually thereafter. The VAWA information provided to owners will consist of the notice in Exhibit 16-5 and a copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, and Stalking and Alternate Documentation.

Current language- Discretion to require no formal documentation VAWA
**PHA** will not accept an individual’s statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault or stalking.

**MHA Policy**
If the PHA accepts an individual’s statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault or stalking, the PHA will document acceptance of the statement or evidence in the individual’s file.

<table>
<thead>
<tr>
<th>Chapter 17</th>
</tr>
</thead>
<tbody>
<tr>
<td>17-I.A.</td>
</tr>
</tbody>
</table>

**MHA Policy**
The PHA will operate a project-based voucher program using up to 20 percent of its authorized units for project-based assistance.

**MHA Policy**
MHA will operate a project-based voucher program using up to 20 percent of its budget authority for project-based assistance.
<table>
<thead>
<tr>
<th>New Regulation (HOTMA)</th>
<th>Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21]</th>
</tr>
</thead>
<tbody>
<tr>
<td>MHA Policy</td>
<td>The PHA may project base an additional 10 percent of its units for units that will house homeless families, veterans, have supportive services and are located in a low poverty census tract area per PIH Notice 2017-21.</td>
</tr>
</tbody>
</table>

**Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]**

MHA Policy
The PHA does not currently have any units not subject to the 20 percent cap.

<table>
<thead>
<tr>
<th>17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Units Selected Non-Competitively [FR Notice 1/18/17; Notice PIH 2017-21; 24 CFR 983.51(b)]</td>
</tr>
</tbody>
</table>

For certain, public housing projects where the PHA has an ownership interest or control, the PHA may attach PBV assistance non-competitively without following one of the two processes above.

This exception applies when the PHA is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP.
If the PHA is planning rehabilitation or new construction on the project, a minimum threshold of $25,000 per unit in hard costs must be expended.

If the PHA plans to replace public housing by attaching PBV assistance to existing housing in which the PHA has an ownership interest or control, then the $25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with HQS. The PHA must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site.

**MHA Policy**

The PHA intends to project base units noncompetitively in order to replace public housing units in a project in which the PHA has an ownership interest or control which meet the requirements under HOTMA to select units non-competitively. The PHA will detail the work it plans to do on the public housing property or site as well as how many units it plans to project-base at the property or site through the annual and/or five-year plan process. The PHA will ensure that units are eligible for PBV assistance and meet all statutory and regulatory requirements for the PBV program. The existing housing will substantially comply with HQS, which the PHA defines as units with no life-threatening violations that will pass HQS the earlier of six months after PBV HAP contract execution or at the end of the construction period.

The following policies in this chapter on solicitation and selection of owner proposals do not apply to units selected under this option.
### Solicitation and Selection of PBV Proposals [24 CFR 983.51(c)]

In order to promote partially assisted projects, projects where less than 25 percent of the units will be assisted will be rated higher than projects where 25 percent or more of the units will be assisted. In the case of projects for occupancy by the elderly, persons with disabilities or families needing other services, the PHA will rate partially assisted projects on the percentage of units assisted. Projects with the lowest percentage of assisted units will receive the highest score.

### PHA-Owned Units [24 CFR 983.51(e), 983.59, FR Notice 1/18/17, and Notice PIH 2017-21]

**MHA Policy**

The PHA may submit a proposal for project-based housing that is owned or controlled by the PHA. If the proposal for PHA-owned housing is selected, the PHA will use **Nan McKay & Associates** to review the PHA selection process. The PHA will obtain HUD approval of the third-party entity, **Nan McKay & Associates** prior to selecting the proposal for PHA-owned housing.

### MHA-owned Units [24 CFR 983.51(e) and 983.59]

**MHA Policy**

MHA may submit a proposal for project-based housing that is owned or controlled by MHA. If the proposal for MHA-owned housing is selected, MHA will use **Sonoma County Redevelopment Agency**, or a HUD-approved independent entity, to review MHA selection and to administer the PBV program. MHA will obtain HUD approval of **Sonoma Redevelopment Agency**, or a HUD-approved independent entity, prior to selecting the proposal for MHA-owned housing.

### MHA Policy

Within **10 business days** of the PHA making the selection, the PHA will notify the selected owner in writing of the owner’s selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner.

### MHA Policy

Within **15 calendar days** of MHA making the selection, MHA will notify the selected owner in writing of the owner’s selection for the PBV program. MHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner.
### 17.II.F

<table>
<thead>
<tr>
<th>CAP ON NUMBER OF PBV UNITS IN EACH PROJECT</th>
<th>CAP ON NUMBER OF PBV UNITS IN EACH PROJECT</th>
</tr>
</thead>
</table>

#### Supportive Services

PHAs must include in the PHA administrative plan the type of services offered to families for a project to qualify for the exception and the extent to which such services will be provided. As of April 18, 2017, the project must make supportive services available to all families receiving PBV assistance in the project, but the family does not actually have to accept and receive supportive services for the exception to apply to the unit, although the family must be eligible to receive the supportive services. It is not necessary that the services be provided at or by the project, but must be reasonably available to families receiving PBV assistance at the project and designed to help families in the project achieve self-sufficiency or live in the community as independently as possible A PHA may not require participation in the supportive service as a condition of living in the excepted unit, although such services may be offered.

#### MHA Policy

The PHA will allow excepted units for elderly and units where supportive services will be provided.

Families will not be required to accept and receive supportive services for the exception to apply to the unit, although they will be required to be eligible to receive supportive services. The following types of services are allowable as supportive services depending on the needs of the family:

#### MHA Policy

MHA may provide PBV assistance for excepted units. MHA may develop housing for occupancy by elderly and disabled families and/or families in need of services.

Families in the Family Self-Sufficiency Program that do not continue to receive the services or complete the required service program will be terminated in accordance with MHA policies in Section 12-II.F.
<table>
<thead>
<tr>
<th>Service Type</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meal service</td>
<td>adequate to meet nutritional needs;</td>
</tr>
<tr>
<td>Housekeeping</td>
<td>aid;</td>
</tr>
<tr>
<td>Personal assistance;</td>
<td></td>
</tr>
<tr>
<td>Transportation services;</td>
<td></td>
</tr>
<tr>
<td>Health-related services;</td>
<td></td>
</tr>
<tr>
<td>Case management;</td>
<td></td>
</tr>
<tr>
<td>Child care;</td>
<td></td>
</tr>
<tr>
<td>Educational and employment services;</td>
<td></td>
</tr>
<tr>
<td>Job training;</td>
<td></td>
</tr>
<tr>
<td>Counseling; or</td>
<td></td>
</tr>
<tr>
<td>Other services designed to help the recipient live in the community as independently as possible.</td>
<td></td>
</tr>
</tbody>
</table>

The following types of services will be provided depending on the needs of the family:

- Transportation for activities such as, (but not limited to) grocery shopping, job training, education, attending medical and dental appointments, etc.
- Supervised taking of medications
- Treatment for drug addiction (for recovering and current users)
- Treatment for alcohol addiction (for recovering and current users)
- Training and development of housekeeping and homemaking skills
- Family budgeting
- Child care
- Parenting skills
- Computer access and training
- Library access
- Work skills development, job training and employment counseling
- Educational/vocational opportunities
- Case management services and/or counseling
- Access to Health and Psychiatric Services, i.e. nurse/medical staff, mental health professional, etc.
- Life skills training
- Access to on-site/off-site social activities

**Promoting Partially Assisted Projects [24 CFR 983.56(c)]**

A PHA may establish local requirements designed to promote PBV assistance in partially assisted projects. A partially assisted project is a project in which there are fewer units covered by a HAP contract than residential units [24 CFR 983.3].
A PHA may establish a per-project cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily project containing excepted units or in a single-family building.

A PHA may also determine not to provide PBV assistance for excepted units, or the PHA may establish a per-project cap of less than 25 units or 25 percent of units.

**MHA Policy:**
The MHA will allow excepted units for elderly families and units that have supportive services at the project. Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per project.

<table>
<thead>
<tr>
<th>17.V.C</th>
<th><strong>17-V.C. AMENDMENTS TO THE HAP CONTRACT</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MHA Policy</strong></td>
<td>The PHA may add units to the contract at any time at the discretion of the PHA. The PHA may add units up to the maximum project cap, including any excepted units at the development.</td>
</tr>
</tbody>
</table>

MHA may establish a per-project cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily project containing excepted units or in a single-family building. MHA may also determine not to provide PBV assistance for excepted units, or MHA may establish a per project cap of less than 25 percent.

**MHA Policy:**
MHA will not impose any cap beyond HUD regulations on the number of PBV units assisted per project.

<table>
<thead>
<tr>
<th>17-VI.C</th>
<th><strong>ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]</strong></th>
</tr>
</thead>
</table>

MHA Policy
MHA will consider adding contract units to the HAP contract when MHA determines that additional housing is needed to serve eligible low-income families. Circumstances may include, but are not limited to: The local housing inventory is reduced due to a disaster (either due to loss of housing units, or an influx of displaced families); and Voucher holders are having difficulty finding units that meet program requirements.
<table>
<thead>
<tr>
<th>MHA Policy</th>
<th>MHA Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>The PHA will make referrals from the existing HCV waiting list.</td>
<td>Generally, MHA will not establish a separate PBV waiting list.</td>
</tr>
<tr>
<td>The PHA <strong>will</strong> establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance.</td>
<td>However, at times MHA <strong>may</strong> establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance.</td>
</tr>
</tbody>
</table>
| The PHA currently has waiting lists for the following PBV projects:  
  - Point Reyes  
  - Hamilton Housing  
  - Victory Village  
  - Warner Creek  
  - Isabel Cook  
  - Fairfax Vest Pocket | MHA currently has waiting lists for the following PBV projects:  
  - ☑ Point Reyes  
  - ☑ Hamilton Housing |

### 17.VI.D Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

<table>
<thead>
<tr>
<th>MHA Policy (Added Supportive services)</th>
<th>MHA Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, elderly families or units with <strong>supportive services</strong>, or mobility-impaired persons for accessible units).</td>
<td>MHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, qualifying families <strong>for “excepted units,” mobility impaired persons for accessible units</strong>).</td>
</tr>
<tr>
<td>Any <strong>additional preference</strong> for the PBV program or for particular PBV project are listed as an Exhibit to Chapter 17.</td>
<td>MHA <strong>will not</strong> offer any additional preferences for the PBV program or for particular PBV projects or units.</td>
</tr>
</tbody>
</table>