

Administrative Plan Proposed Changes for FY 2016

Chapter, Section	Page in 2016 Plan	Current Language	Proposed Language	Reason for Change
1-II.C.; Part. Major Respon.	10	Add bullet point.	Promptly notify the HACC of any changes in family income;	Add requirement to report income changes.
3.III.C.; Criminal Activity	42	If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past five years, the family will be denied assistance:	If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past three years, the family will be denied assistance:	Follow recent HUD guidance about screening for criminal activity and to be consistent with the time frame on HUD-mandated denials.
3.III.C.; Criminal Activity	42	For possession of cannabis or drug use, the HACC will review the activity within the last three years.	Remove bullet point.	Changed all to 3 years; no need to distinguish.
4.III.C.; Admit. Pref.	66	Working families and those unable to work due to age or disability	People with disabilities	Income targeting is 75% of new admissions are ELI. Preference for working families may make it difficult to achieve, particularly when new admission rate is very low. Employment status changes and difficult to apply preference when changes occur.
4.III.C.; Admit. Pref.	66	Victims of domestic violence	Victims of domestic violence, dating violence, sexual violence, stalking, or human trafficking	Expand preference based on HUD's recent final rule on VAWA.
Except. To Subsidy Stand.	77	A need for an additional bedroom for medical equipment	A need for an additional bedroom for medical equipment - size of equipment, frequency of use, and when use is required will factor into the determination. Fitness equipment will not be considered for an additional bedroom.	Clarify how determination for additional is made.
9.I.E.; Lease Purch.	180	Add paragraph.	The family must notify the Homeownership Counselor at the HACC and apply to participate in the Homeownership Program. If determined eligible for the Homeownership Program, the family may be admitted to the Homeownership Program and must meet all eligibility requirements. Entering into a lease purchase agreement with an owner does not guarantee eligibility for the Homeownership Program. See Chapter 15 for further discussion on the Homeownership Program.	Clarify that lease purchase agreements will require approval to participate in the Homeownership Program.

Administrative Plan Proposed Changes for FY 2016

Chapter, Section	Page in 2016 Plan	Current Language	Proposed Language	Reason for Change
10.I.A.; Allow. Moves	184	The lease for the family's unit has been terminated by mutual agreement of the owner and the family.	The lease for the family's unit has been terminated by mutual agreement of the owner and the family, provided this agreement is not within the first year of the lease.	Clarify the mutual agreement to terminate the lease cannot be in the first year.
10-I.C.; Reexam of Income	186	For families approved to move to a new unit within the HACC's jurisdiction, the HACC will perform an interim examination in accordance with the policies set forth in Chapter 11 of this plan.	The family may complete an interim reexamination if there is a substantial change in household income or family members. Otherwise, the annual reexamination will be completed every 12 months on the anniversary date. The anniversary date of the annual reexamination may not correspond with the effective date of a new lease.	Clarify that annual recert is no longer linked to lease effective dates.
13-I.D.; Lease to Relative	231	none	When considering a reasonable accommodation allowing a family to live in a unit owned by a relative, the HACC may require to provide information to show how the unit accommodates the family member's disability in a way that no other unit can.	Clarify RA for renting from relative.
15.VIII.; Special Prog.		Add section for special programs.	Special allocation of 50 vouchers for the countywide <i>Better Health Through Housing</i> effort. Specifics of this initiative are not finalized, but the allocation is necessary.	Studies show health outcomes for people are improved when they have stable, adequate housing.
15.VIII.; Special Prog.		Add section for special programs.	Special allocation of 25 vouchers for the victims of human trafficking. Specifics of this initiative are not finalized, but the allocation is necessary.	HUD initiative to provide housing resources.
15.VIII.; Special Prog.		Add section for special programs.	Special allocation of 25 vouchers for expanding the re-entry pilot program.	Current program allows additions to existing households. HUD guidance suggests housing resources for re-entry purposes.
16-III.C. ; No Hearing Req.	283	Add bullet point.	· The family's decision to voluntarily withdraw from a rental assistance program.	Add reason for denying hearing.
16-III.C. ; Sched. Informal Hearing	283	none	The HACC will hold the hearing open for at least one week. If the family does not contact the HACC, the hearing officer will make send a written decision to uphold the termination or other decision of the HACC.	Clarify procedure for no show to hearing.
16-III.C. ; Proc. for Re- hearing	286	none	in the hearing officer conditionally reinstates the family, the hearing decision shall include the date and time of a compliance meeting at which the family can demonstrate that the family has met the conditions required by the hearing decision for reinstatement.	Add compliance meeting process.

Administrative Plan Proposed Changes for FY 2016

Chapter, Section	Page in 2016 Plan	Current Language	Proposed Language	Reason for Change
16-IV.B.; Repay Agree.	292	<p>Total debt owed Amount of lump sum payment made at time of execution, if applicable The monthly repayment amount The due date of the monthly payment The reason for the repayment agreement The terms of the agreement may be renegotiated if there is a decrease in the family's income, at the written request of the family, or increase in the family's Late and missed payments constitute default of the repayment agreement and may result in termination of assistance income, at the written notification of the HACC</p>	<p>Total debt owed Amount of lump sum payment made at time of execution, if applicable The monthly repayment amount The due date of the monthly payment The reason for the repayment agreement The terms of the agreement may be renegotiated if there is a decrease in the family's income, at the written request of the family, or increase in the family's Renegotiated terms will not be retroactive, but will be effective the first of the month following the written notice of the family or the HACC Late and missed payments constitute default of the repayment agreement and may result in termination of assistance, at the written notification of the HACC</p>	Clarify effective date of renegotiated terms.
16-IV.B.; Repay Agree.	292	<p>The monthly retroactive rent payment plus the amount of rent the tenant pays at the time the repayment agreement is executed should be affordable and should not exceed 40 percent of the family's monthly adjusted income. The HACC will calculate the monthly payment and the length of the agreement by subtracting the family's monthly rent portion from 40% of the family's monthly adjusted income and determining the number of months needed to pay the balance at that rate.</p>	<p>The monthly retroactive rent payment plus the amount of rent the tenant pays at the time the repayment agreement is executed should be affordable and should not exceed 40 percent of the family's monthly adjusted income. The HACC will calculate the monthly payment and the length of the agreement by subtracting the family's monthly rent portion from 40% of the family's monthly adjusted income and determining the number of months needed to pay the balance at that rate. If the family's rent portion is currently based on 40% of its income, the family must still enter into a repayment agreement with a minimum monthly payment of \$25.</p>	Clarify that a family at 40% still is obligated to enter into a repayment agreement.
16-IV.B.; Non-pay.	293	<p>If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by the HACC, the HACC will send the family a delinquency notice giving the family 15 business days to make the late payment and may impose a late fee of \$25. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the HACC will terminate assistance upon written notification to the family. If a family receives 3 delinquency notices for unexcused late payments in a 12 month period, the repayment agreement will be considered in default and the HACC will terminate assistance upon written notification to the family.</p>	<p>If the family fails to make 3 payments during the repayment period, the HACC will issue a notice of termination for default. The family may appeal the decision as outlined earlier in this chapter. The family may avoid termination by paying any past due balance and resuming monthly payments.</p>	Clarify procedure for default on repayments.