

**Summary of Proposed Changes
Admissions & Continued Occupancy Policy
7-26-19**

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
Chapter 2: Fair Housing & Equal Opportunity				
1.	2.7.7 Victim Documentation	HABC	<ul style="list-style-type: none"> Adding denial and requesting an emergency transfer under victim documentation related to VAWA transfers 	<ul style="list-style-type: none"> When a resident family is facing denial or termination of assistance or is requesting an emergency move because of the actions of a resident household member, or other person under the resident's control and a resident or immediate family member of the resident's family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, sexual assault or stalking, HABC and the privately owned/managed sites will require the individual to submit documentation affirming that claim.
Chapter 3: Application & Waiting List				
2.	3.3 Applying for Assistance	HABC	<ul style="list-style-type: none"> Not currently included in the ACOP 	<ul style="list-style-type: none"> HABC will provide paper pre-applications upon request
3.	3.4 Preliminary Application to PH & Placement on WL	HABC	<ul style="list-style-type: none"> Not currently included in the ACOP 	<ul style="list-style-type: none"> The waiting list for Thompson PCD and Remedial Vouchers is maintained by BRHP and is separate from any other HABC waiting list. Application for, receipt of, or termination of a Thompson Voucher will not affect a family's standing on any other HABC waiting list.
4.	3.6 Types of Waiting Lists	24 CFR 903.7	<ul style="list-style-type: none"> Revised language on types of waiting lists to reflect the waiting list options offered including descriptions 	<ul style="list-style-type: none"> Centrally Administered Location Based Waiting List: CALBWL <ul style="list-style-type: none"> This waiting list includes all units/developments not covered under the Centrally Administered Mixed Population & Other Units Covered under Bailey (CAMPBWL) described below. Families may select up to 3 developments on the CALBWL When selecting only developments covered under the CALBWL, families offered a unit at one of the CALBWL selected developments, will be removed from all of the waiting lists covered under the CALBWL if the offer is refused without good cause. <p>Families meeting the eligibility requirements for the CAMPBWL may select to be listed on the CAMPBWL and may select up to two developments on the CALBWL.</p> <ul style="list-style-type: none"> Centrally Administered Mixed Population & Other Units Covered under Bailey: CAMPBWL:

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				<ul style="list-style-type: none">○ This waiting list includes the units at mixed population developments and other units covered under Bailey.○ Families on this waiting list may receive up to three unit offers and if they refuse all three offers without good cause, they will be removed from all centrally managed waiting lists. Families cannot select specific developments covered under CAMPBWL. <ul style="list-style-type: none">● Centrally Administered First Available Waiting List: CAFAWL<ul style="list-style-type: none">○ Families selecting the CAFAWL may not select any other waiting list option.○ Families who select the CAFAWL are listed on all the development waiting lists for which they are eligible, including those developments covered under the CALBWL and CAMPBWL.○ Families offered a unit will be removed from the waiting list if the offer is refused without good cause. <p>Families may select from the list of waiting list options below; however only families meeting the eligibility requirements for the CAMPBWL may select to be listed on the CAMPBWL. Additionally, families meeting the eligibility requirements for the CAMPBWL may select to be listed on the CAMPBWL and may select up to two developments on the CALBWL.</p> <ul style="list-style-type: none">● CAFAWL only; or● CALBWL: Up to three developments covered under the CALBWL● CALBWL and CAMPBWL: Up to two developments covered under CALBWL and selecting to be listed on the CAMPBWL. For example, an elderly family or a non-elderly person with a disability may choose to be on the list for the developments covered by the CAMPBWL and may also choose to be listed on the CALBWL for two family developments such as Brooklyn Homes and Cherry Hills Homes, etc.; or● CAMPBWL only, for three offers for developments covered by this waiting list.

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5.	3.11 Removal from the Waiting List	HABC	<ul style="list-style-type: none"> Added policy language to clarify all reasons for removal from the WL Added policy language to reflect denial related to owner screening 	<p>HABC will follow applicable regulatory requirements for notice of removal. Applicant's names will be removed from all PH Waiting Lists for as a result of any of the following.</p> <ul style="list-style-type: none"> Being housed in a PH/RAD unit; Being withdrawn; Being determined ineligible by HABC; Refusal—an applicant refused the threshold number of offers of housing without Good Cause; and Upon written request by the applicant family. In such cases no informal hearing is required. <p>For the two policies below, rejection assumes that the cause is not related to an actionable unit which would result in rejection at any development, i.e. lifetime sex offender registration requirement.</p> <p>HABC will remove an applicant's name from a development's CALBWL when an owner/management agent rejects an applicant from a specific development. The applicant will retain placement on all other CALBWLs even if managed by the same owner/management agent. HABC will allow the applicant to select a new CALBWL and retain his/her date and time of application.</p> <p>Where an owner/management agent rejects an applicant from a development covered by the CAFAWL or CAMPBWL, HABC will retain the applicant's placement on the CAFAWL and CAMPBWL; however, the applicant will no longer be offered units at the development where they were rejected.</p>
Chapter 4: Eligibility for Admission				
6.	4.6 Requirement to Attend Interview	HABC	<ul style="list-style-type: none"> Added policy on missing two scheduled interviews and provided for additional outreach for elderly/disabled households 	<ul style="list-style-type: none"> All adult household members are required to attend the interview. If a family misses two scheduled interviews, without good cause, HABC will withdraw the family from the waiting list. If an elderly or disabled family misses the second scheduled interview, HABC will attempt to contact the head of household by phone and schedule a third interview. If HABC is still unable to reach the applicant HABC will withdraw the family from the waiting list

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				<ul style="list-style-type: none">If a family is withdrawn from the waiting list and then responds to HABC within 90 calendar days from the date of withdrawal, HABC will reinstate the family to the waiting list.																				
Chapter 5: Tenant Selection and Assignment Plan																								
7.	5.3 Local Preferences	HABC	<ul style="list-style-type: none">Clarified qualification for certain preferences to reflect requirement that condition be experienced by either the Head, Co-Head or Spouse and other preferences for which the qualification can be any household member.	<ul style="list-style-type: none">Head, Co-head Spouse related preferences:<ul style="list-style-type: none">Natural Disaster in Baltimore Metro Area, Families Displaced due to Governmental Action, Employed, Elderly, Job Training, Veteran, ResidencyAny Household Member related preferences:<ul style="list-style-type: none">Disabled																				
8.	5.3 Local Preferences	HABC	<ul style="list-style-type: none">Clarified residential housing and government actions	<ul style="list-style-type: none">Families displaced from the family's residential housing unit due to governmental action that occurs in Baltimore City. The Head of Household, Co-head of Household or spouse has to be the person who is or is being displaced. For these purposes, the term "residential housing unit" means real property that: (1) contains a permanent structure constructed, or otherwise approved by the governing government authorities, for human habitation in accordance with applicable building codes; (2) has an address recognized by the United States Postal Service for delivery of mail; and (3) is occupied by the owner or by verified permission of the owner. For these purposes, Government action does not include acts to remove a person from any land, structure, place, space, or thing, which such person has no legal right to occupy or remain.																				
9.	5.5 Order of Selection	HABC	<ul style="list-style-type: none">Removed transfer category in hierarchy of selection as "Transfer pursuant to an HABC MOU" is not a transfer category but is a potential outcome for any transfer.	<table><tr><th>Transfer Type or Admission Preference</th><th>Applicant or Transfer</th></tr><tr><td>Emergency to address health, safety, and habitability issues</td><td>Transfer</td></tr><tr><td>Emergency VAWA</td><td>Transfer</td></tr><tr><td>Emergency IV/IW</td><td>Transfer</td></tr><tr><td>Emergency preference</td><td>Applicant</td></tr><tr><td>Immediate Needs</td><td>Transfer</td></tr><tr><td>Reasonable accommodation</td><td>Transfer</td></tr><tr><td>Transfer pursuant to an HABC MOU</td><td>Transfer</td></tr><tr><td>Demolition, Disposition, Revitalization, or Rehabilitation</td><td>Transfer</td></tr><tr><td>Transfers from accessible units</td><td>Transfer</td></tr></table>	Transfer Type or Admission Preference	Applicant or Transfer	Emergency to address health, safety, and habitability issues	Transfer	Emergency VAWA	Transfer	Emergency IV/IW	Transfer	Emergency preference	Applicant	Immediate Needs	Transfer	Reasonable accommodation	Transfer	Transfer pursuant to an HABC MOU	Transfer	Demolition, Disposition, Revitalization, or Rehabilitation	Transfer	Transfers from accessible units	Transfer
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				Severely over/under-housed	Transfer	
				Over/Under housed *	Transfer	
				Local Preference 3 *	Applicant	
				Local Preference 2 *	Applicant	
10.	5.5 Order of Selection	HABC	<ul style="list-style-type: none"> Corrected example to reflect application of the employed preference and the residency preference where employment in Baltimore City is concerned. 	Applicant C: <ul style="list-style-type: none"> Applied on 10/10/15 Works in Baltimore City Receives 2 points for working in Baltimore City (residency preference) Receives 1 point for being employed 		
11.	5.8 Unit Offers	Bailey Supp. Consent Decree & HABC	<ul style="list-style-type: none"> Adding policy language regarding unit offers for applicants on each waiting list type 	<ul style="list-style-type: none"> Unit offers will be made to eligible applicants in the ready pool according to their ranking order. If an applicant has been offered a unit from one of the applicant's selected waiting lists, HABC will not refer the applicant for other vacant units until a determination is made on the open referral. For example, if an applicant is referred to a unit at Primrose Place and the applicant is also on the waiting list for Heritage Crossing, the applicant will not be offered a unit at Heritage Crossing until an outcome has been determined on the unit offered at Primrose Place. 		
12.	5.8.1 Unit Offers for Applicants on the CALBWL Only	Bailey Supp. Consent Decree & HABC	<ul style="list-style-type: none"> Added language unit offers for applicants who are only listed on the CALBWL 	<ul style="list-style-type: none"> When an applicant selects up to three developments on the CALBWL only, the refusal of one unit offer, without good cause, will result in removal from all selected developments covered by the CALBWL. The applicant must reapply. 		
13.	5.8.2 Unit Offers for Applicants on the CALBWL and CAMPBWL	Bailey Supp. Consent Decree & HABC	<ul style="list-style-type: none"> Added language unit offers for applicants who are listed on the CALBWL and CAMPBWL 	<ul style="list-style-type: none"> If an applicant selects the CAMPBWL and one or two developments covered by the CALBWL, the applicant will have a total of three refusals of unit offers, without good cause, before being removed from all centrally managed waiting lists. For example, assuming refusals are without good cause: <ul style="list-style-type: none"> If an applicant selects Heritage Crossing, Gilmor Homes and the CAMPBWL and the applicant refuses an offer at Heritage Crossing, the applicant will be removed from the Heritage Crossing waiting list and will have two more unit refusals before being removed from the Gilmor Homes and the CAMPBWL. 		

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				<ul style="list-style-type: none"> ○ If the applicant is next offered a unit from the CAMPBWL and refuses the offer, the applicant will remain on both the CAMPBWL and Gilmore waiting lists. ○ If the applicant is next offered a unit from either the CAMPBWL or Gilmore waiting list and refuses the offer, the applicant will be removed from the CAMPBWL and Gilmore waiting lists. The applicant will no longer be listed on any waiting lists and must reapply
14.	5.8.3 Unit Offers for Applicants on the CAMPBWL Only	Bailey Supp. Consent Decree & HABC	<ul style="list-style-type: none"> • Added language unit offers for applicants who are only listed on the CAMPBWL 	<ul style="list-style-type: none"> • Applicants who have selected the CAMPBWL only will not be able to choose a specific development covered under the CAMPBWL. HABC will provide up to three (3) offers of dwelling units for applicants who have the CAMPBWL as their waiting list option. If an applicant refuses three unit offers without good cause, the applicant will be removed from the CAMPBWL and must reapply.
15.	5.8.4 Units Offers for Applicants on the CAFAWL	HABC	<ul style="list-style-type: none"> • Added language unit offers for applicants who are only listed on the CAFAWL 	<ul style="list-style-type: none"> • Applicants who have selected the CAFAWL only will be included on all development/unit waiting lists for which they are eligible. Applicants who choose the CAFAWL will not be able to choose a specific development covered under the CAFAWL. HABC will provide one unit offer to an applicant who has chosen the CAFAWL as their waiting list option. If an applicant refuses the unit offer, without good cause, the applicant will be removed from the CAFAWL and must reapply.
16.	5.8.5 Unit Offers for Project Based Units Covered under the LTA Criteria	LTA Criteria	<ul style="list-style-type: none"> • Not currently included in the ACOP 	<ul style="list-style-type: none"> • HABC will select applicants for Project-Based (PB) Units covered under the LTA Criteria from the PH CALBWL. The waiting list will identify the PB LTA units and inform interested families that the PB LTA units will be subject to PB Program regulatory requirements and applicable policies in the HCV Admin Plan.
17.	5.9 Units/Developments Included in the CAMPBWL	Bailey Supp. Consent Decree	<ul style="list-style-type: none"> • Added the units covered under CAMPBWL 	<ul style="list-style-type: none"> • The CAMPBWL includes the following units and developments: <ul style="list-style-type: none"> ○ Allendale ○ Bel Park Towers ○ Bernard E. Mason ○ The Brentwood ○ Chase House ○ Ellerslie ○ Govans Manor ○ Hollins House ○ J. Van Story Branch ○ Lakeview Tower and Lakeview Extension

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				<ul style="list-style-type: none"> ○ McCulloh High Rise ○ Monument East ○ Primrose Place ○ Rosemont Towers ○ Wyman House ○ Pleasant View Gardens Senior-12 UFAS Accessible Units developed pursuant to the Bailey Consent Decree ○ Pleasant View Gardens Family-13 UFAS Accessible Units developed pursuant to the Bailey Consent Decree and one-bedroom units converted under RAD ○ Senior Terraces Apartment Building - 4 UFAS Accessible Units developed pursuant to the Bailey Consent Decree <ul style="list-style-type: none"> ● 1 bedroom units and applicable UFAS Accessible Units at the following developments: <ul style="list-style-type: none"> ○ Arbor Oaks (4 UFAS Accessible Units developed pursuant to the Bailey Consent Decree) ○ Heritage Crossing (4 UFAS Accessible Units developed pursuant to the Bailey Consent Decree) ○ Hillside Park ○ Townes at the Terraces (11 UFAS Accessible Units developed pursuant to the Bailey Consent Decree) ● UFAS Accessible Units at Broadway Overlook ● 479 UFAS Accessible Units in public housing, scattered site housing, or privately owned or managed property developed under the Bailey Consent Decree that use the Long-Term Affordable (LTA) Criteria ● Vacancies for the units and developments covered under the CAMPBWL will be filled by the first eligible applicant on the CAMPBWL, CAFAWL or the reasonable accommodations transfer list. Where the term eligible families is concerned, this means that the waiting list will include only those families

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				who meet the eligibility requirements for the development, i.e. Elderly Only, Mixed Population (elderly or non-elderly disabled), Family.
18.	5.10 Offer of Accessible Units	HABC	<ul style="list-style-type: none"> Not currently included in the ACOP 	<ul style="list-style-type: none"> Where a family needs a 2 or more BR unit on one level without steps, the only available units which meet this qualification are UFAS Accessible Units. As such, families who are verified to need such a unit, may be offered a UFAS Accessible Unit.
19.	5.17 Unit Refusal		<ul style="list-style-type: none"> Revised policy to reflect situations where 1 and where 3 unit offers are allowed. 	<ul style="list-style-type: none"> Generally, if an applicant rejects a unit that is offered, the applicant will be withdrawn from all centrally managed Public Housing waiting list unless the applicant can demonstrate and HABC can verify good cause for the refusal. Where unit offers are made for units covered under the CAMPBWL, if an applicant rejects three unit offers, the applicant will be withdrawn from all centrally managed Public Housing waiting list unless the applicant can demonstrate and HABC can verify good cause for the refusal.
<ul style="list-style-type: none"> Chapter 7: Verification 				
20.	7.3 EIV and HUD Income Validation Tool (IVT)	PIH Notice 2018-18	<ul style="list-style-type: none"> Added policy language to reflect requirements related to HUD's new Income Validation Tool (IVT) and changes to requirements surrounding income discrepancies 	<ul style="list-style-type: none"> Changes made throughout chapter to reflect the dictates of the PIH Notice
21.	7.4 Overview of Verification Requirements 7.24.1 Verification of Earned Income	HABC	<ul style="list-style-type: none"> Clarified document and verification requirements 	<ul style="list-style-type: none"> The documents must not be altered or in any way illegible. HABC may reject any tenant provided documentation if: <ul style="list-style-type: none"> The document is not an original; or The original document has been altered, mutilated or is not legible; or The document appears to be a forged document (i.e. does not appear to be authentic) Where income is fully excluded, HABC will not conduct third party verification of the income. HABC will not verify adult full-time student (for adult FT students other than the head, co-head or spouse) income as 100% of the earned income is excluded; however, HABC will verify full-time student status.
22.	7.9 Oral 3 rd Party Verification	HABC	<ul style="list-style-type: none"> Changed the number of days from 10 to 5 for a response to an oral verification request 	<ul style="list-style-type: none"> Oral third-party verification is mandatory if no form of written third-party verification is available. Third-party oral verification may be used when requests for written third-party verification forms have not been returned within 5 working days. HABC or the privately owned/managed site will document oral verification attempts in the resident file.

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23.	7.12 Resident Fails to Respond to a Verification Request	HABC	<ul style="list-style-type: none"> Changed the number of days from 10 to 5 for a resident response to a verification request. 	<p>HABC or the privately owned/managed site will take the following actions when a family fails to respond to the request for verification:</p> <ul style="list-style-type: none"> 5 working days after the request for verification, HABC or the privately owned/managed site will send a letter to the head of household, warning of the consequences if the family fails to contact HABC or the privately owned/managed site within the time frame set forth in the letter.
24.	7.28 Zero, Minimal Income & Temporary or Sporadic Income	HABC	<ul style="list-style-type: none"> Added language to clarify verification requirements for a minimal income family 	<ul style="list-style-type: none"> A zero income household is one where no household member receives any income, contributions and/or benefits on his/her own behalf or on behalf of another individual in the household. A minimal income household is one where the combined gross household income is less than \$2,000 per year. A temporary or sporadic income household is one where the only source of income is temporary or sporadic income. See Chapter 13: Reexamination and Continued Occupancy policies related to zero, minimal income and temporary/sporadic income households. Households that report zero or minimal income and households reporting only temporary or sporadic income may be required to provide information regarding their means of basic subsistence, such as food, utilities, transportation, etc. If the family's expenses exceed the family's known income, HABC or the privately owned/managed site may make inquiry as to the nature of the family's accessible resources. HABC or the privately owned/managed site will require the following when the household claims zero or minimal or only temporary/sporadic income at each successive income reexamination: <ul style="list-style-type: none"> Head or co-head of household must complete a Personal Declaration and Continued Occupancy Application. Completion of a zero income self-certification by each adult

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				<p>household member;</p> <ul style="list-style-type: none"> ○ EIV check to confirm that no household member has any income or in the case of a minimal income family, to verify the income reported; ○ Verification of any income source received at the certification prior to the claim of zero income, minimal income or temporary or sporadic income. For example if one household member, at the certification prior to the claim of zero income, had wage income, HABC or the privately owned/managed site will verify termination of employment. <p>HABC will run an EIV income report every 180 days for zero income, minimal income and temporary/sporadic income households and will take action for unreported income.</p>
Chapter 8: Income & Adjusted Income				
25.	8.8 Wages	MTW	<ul style="list-style-type: none"> • Included language to reflect the policy in the approved MTW FY 2019 Plan 	<ul style="list-style-type: none"> • Under the authority of the MTW Agreement, HABC will exclude all full-time student earned income for adult full time students, other than the head of household, co-head and spouse. HABC will continue to apply a dependent deduction to adult full-time students. Additionally, as HABC is excluding 100% of earned income for adult full-time students, HABC will verify full-time student status; however, HABC will not conduct verification of full-time student earned income. <p>Earned income include wages, income from a business and military pay</p>
26.	8.32 Full Time Student Income Exclusion	MTW	<ul style="list-style-type: none"> • Included language to reflect the policy in the approved MTW FY 2019 Plan 	<ul style="list-style-type: none"> • HABC will exclude all adult, full-time student earned income, excluding the head of household, co-head or spouse. HABC will not verify adult full-time student income as 100% of the earned income is excluded.
27.	8.33 Asset Income	MTW	<ul style="list-style-type: none"> • Included language to reflect the policy in the approved MTW FY 2019 Plan • Removed policy related to non-MTW as it does not apply 	<ul style="list-style-type: none"> • If the family has net family assets in excess of \$50,000, annual income shall include the market value of the asset times the passbook savings rate. • Upon HUD approval, using its MTW authority, HABC will exclude income from assets where the market/face value of the asset is up to \$50,000.

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				When the market/face value of a family's assets is in excess of \$50,000, HABC will calculate asset income by taking the market/face value of the family's assets and multiplying that value by the established passbook savings rate.
Chapter 9: Calculating Total Tenant Payment & Rent				
28.	9.3 TTP for Over Income Families	HUD Final Rule on Over Income Families	<ul style="list-style-type: none"> Not currently included in the ACOP 	<ul style="list-style-type: none"> The monthly rent for a family whose adjusted income exceeds 120% of the area median income for two consecutive years will be set by HUD in forthcoming guidance; however, where residents reside in units financed with Low Income Housing Tax Credits, rent generally will not exceed the applicable maximum rent as required under Low Income Housing Tax Credit regulations
29.	9.4.8 Flat Rent and the Earned Income Disallowance	HABC	<ul style="list-style-type: none"> Updated the policy language to reflect HABC's policy to hold the EID at 100% for 24 months and its impact on families paying flat rent. 	<ul style="list-style-type: none"> If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred. A family currently paying flat rent that previously qualified for the EID while paying income-based rent and is currently within the family's 48 24 month period would have the 42 24 cumulative months of full (100 percent) and phase-in (50 percent) exclusion continue while paying flat rent as long as the employment that is the subject of the exclusion continues, and the 24 48-month lifetime limit would continue uninterrupted. A family paying flat rent could therefore see a family member's 24 48-month lifetime limit expire while the family is paying flat rent.
Chapter 10: Transfer Policy				
30.	10.5 Types of Transfers	HABC	<ul style="list-style-type: none"> Removed transfer category as "Transfer pursuant to an HABC MOU" is not a transfer category but is a potential outcome for any transfer. 	<ul style="list-style-type: none"> Removed "Transfer Pursuant to an HABC MOU"
31.	10.7 and 10.8 VAWA and IVIW Transfers	HABC VAWA Emergency Transfer Plan	<ul style="list-style-type: none"> Added policy to reflect the selection options for transfers related to VAWA and IVIW 	<ul style="list-style-type: none"> Consistent with HABC's Emergency Transfer Plan, HABC may allow residents requesting Emergency IV/IW transfers to select up to three specific developments for transfer to protect the resident's safety and security. Where three development options are allowed, the applicable developments covered under the CAMPBWL constitute one development selection.
32.	10.9 Administrative Transfers	HABC	<ul style="list-style-type: none"> Added policy on approval requirements 	<ul style="list-style-type: none"> Administrative transfers require approval from the Executive Director or his/her designee.
33.	10.10 Immediate Needs Transfer	HABC	<ul style="list-style-type: none"> Clarified that Immediate Needs Transfers unit selections follow the policies under RA Transfers 	<ul style="list-style-type: none"> Development selections will follow the policies under Reasonable Accommodations Transfers.

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34.	10.11 RA Transfers	HABC	<ul style="list-style-type: none"> Clarified policy of different types of RA transfers 	<p>RA transfers are divided into two groups:</p> <ul style="list-style-type: none"> Transfers to UFAS or units on one level All other RA transfers <p>Residents requesting an RA transfer to a UFAS unit or unit on one level may NOT select specific developments.</p> <p>Residents requesting all other RA transfers may select up to three locations as transfer options.</p> <ul style="list-style-type: none"> Where three development options are allowed, the applicable developments covered under the CAMPBWL constitute one development selection.
35.	10.19 Transfer Waiting Lists	HABC	<ul style="list-style-type: none"> Added policy to clarify that legal directive may be a reason for placement on the transfer WL. 	<ul style="list-style-type: none"> HABC may, at its sole discretion, transfer a resident family without regard to its placement on the transfer list in order to address a family in crisis or to address a legal directive.
36.	10.23 Unit Offers for Transfers	HABC	<ul style="list-style-type: none"> Added policy language to reflect unit offer and refusal policies for the different type of RA transfers 	<ul style="list-style-type: none"> Residents requesting RA transfers will be allowed to refuse three units, without good cause, before being removed from the RA Transfer WL.
Chapter 12: Inspections				
37.	12.7 Unit Inspections 12.11 Unit Inspection Violations	HABC	<ul style="list-style-type: none"> Changed the name of the inspection from Housekeeping to Unit Inspection to more accurately reflect the inspection parameters 	<ul style="list-style-type: none"> HOUSEKEEPING UNIT INSPECTIONS
Chapter 14: Reexaminations & Continued Occupancy				
38.	Over-Income Families	HOTMA 2016	<ul style="list-style-type: none"> Added policy to reflect HUD requirements on over-income families 	<ul style="list-style-type: none"> Under the Housing Opportunity Through Modernization Act (HOTMA) of 2016, over-income is defined as a family with adjusted income which exceeds 120% of area median income (AMI). After a family's adjusted income has exceeded 120% of AMI for two consecutive years, HABC will charge the family a monthly rent which will be set by HUD in forthcoming guidance. At a regular or interim reexamination, if a family's adjusted income exceeds the applicable over-income limit, HABC will document the family file and begin tracking the family's over-income status. A family which is over-income will be placed on an annual recertification frequency beginning with the first regular or interim recertification in which the family exceed the over-income limit.

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
				<ul style="list-style-type: none"> • If one year after the applicable regular or interim reexamination the family's adjusted income continues to exceed the applicable over-income limit, HABC will notify the family, in writing, that their adjusted income has exceeded the over-income limit for one year, and that if the family continues to be over-income for 12 consecutive months, the family will be subject to HABC's over-income rent policies. • If two years after the applicable annual or interim reexamination the family's adjusted income continues to exceed the applicable over-income limit, HABC will charge the family the alternate rent set by HUD; however, where residents reside in units financed with Low Income Housing Tax Credits, rent generally will not exceed the applicable maximum rent as required under Low Income Housing Tax Credit regulations. HABC will notify the family in writing of their new rent amount which will be effective 30 days after HABC's written notice to the family. • • If, at any time, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with HABC policy. If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. In such instances, HABC will notify the family in writing that over-income policies no longer apply to them. If the family's adjusted income later exceeds the over-income limit again, the family will be entitled to a new two-year grace period. • HABC will update the over income limits no later than 60 days after HUD publishes the new income limits each year. • HABC will begin tracking over-income families once these policies have been adopted.
39.	14.4 Reexamination Frequency	HOTMA 2016 HABC	<ul style="list-style-type: none"> • Revised reexamination frequency to reflect HOTMA requirements for over-income families and to reflect HABC requirements for minimal income families. 	<ul style="list-style-type: none"> • Over-income families will be recertified on an annual basis. • Regular re-examination of households who report zero or minimal income and households at privately owned/managed properties will occur annually.

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
				<p>Minimal income is defined as less than \$2,000 in annual gross household income.</p> <ul style="list-style-type: none"> When and if an over-income family's income decreases to the point where their income no longer exceeds 120% of area median income, HABC will conduct a certification to review the family income and determine the applicable recertification frequency for the family.
40.	14.14 Interim Reexamination	HABC	<ul style="list-style-type: none"> Clarified requirement to verify only the information which has changed during an interim recertification. Added policy on required interim reporting for certain families 	<ul style="list-style-type: none"> HABC will verify all income and expense information for the household member for whom the change is reported. Additionally, when a household reports removal of a household member, HABC will verify that the household member has vacated the unit. Income/expense changes for other household members are not required to be reviewed or verified during interim recertifications. Families are required to report the changes outlined below. HABC will process an interim rent change when any of the following occur: <ul style="list-style-type: none"> Zero or minimal income family receives monetary or non-monetary income Family with only temporary or sporadic income receives monetary or non-monetary income Change in family composition
41.	14.14 Interim Reexamination	HABC	<ul style="list-style-type: none"> If a household reports a change that it was not required to make which will result in an increase in rent, HABC will place the information in the file; however, HABC will not process an interim increase in rent. 	<ul style="list-style-type: none"> If a household reports a change that it was not required to make which will result in an increase in rent, HABC will place the information in the file; however, HABC will not process an interim increase in rent. There is one exception to this policy where FSS families are concerned. Upon request from a family participating in the Family Self-Sufficiency Program (FSS), if the family reports an increase in income between regular recertifications and requests an interim recertification, HABC will process the interim recertification so that the family can take advantage of the escrow deposit feature of the FSS program. The family will also experience an increase in rent as a result of the increase in income.
42.	14.20 Zero, Minimal & Temporary & Sporadic Income	HABC	<ul style="list-style-type: none"> Adding reference to households reporting only temporary/sporadic/minimal income to the policies related to zero income families. 	<ul style="list-style-type: none"> A zero income adult is one who does not receive any income, contributions and/or benefits on his/her own behalf or on behalf of another individual in the household.

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP
			<ul style="list-style-type: none"> Income which is temporary/sporadic is not included in household income which effectively results in a zero income household. 	<ul style="list-style-type: none"> A temporary or sporadic income adult is an adult who reports only temporary or sporadic income Temporary and sporadic income is excluded from the calculation of annual income. Zero income adults and adults reporting only temporary/sporadic income are required to report monetary and/or non-monetary changes in income or benefits between regular reexaminations. HABC will process an increase in rent when a zero income or minimal income adult reports an increase in income or benefits between regular reexaminations as well as process an increase in rent when an adult reporting only temporary or sporadic income reports an increase in income or benefits between regular reexaminations. Once income/benefits are received and reported by an adult with zero and/or an adult reporting only temporary/sporadic income, subsequent increases in income/benefits between regular reexaminations do not need to be reported until the next regular reexamination. A zero income or temporary/sporadic income household is one where no household member receives any income, contributions and/or benefits on his/her own behalf or on behalf of another individual in the household or the only income received by the entire household is temporary/sporadic income. A minimal income household is one where the gross annual household income is less than \$2,000. Households that report zero income, minimal or temporary/sporadic income may be required to provide information regarding their means of basic subsistence, such as food, utilities, transportation, etc. If the family's expenses exceed the family's known income, HABC may make inquiry as to the nature of the family's accessible resources. HABC will run an EIV income report on zero income and minimal income households as well as households reporting only temporary/sporadic income every 180 days and take action for unreported income. Regular reexaminations are conducted annually for zero income and minimal income households and households reporting only temporary/sporadic income

No.	Section Name and Subject Area	Source	Existing ACOP	Proposed ACOP		
Chapter 21: Program Integrity						
43.	21.9 Payment Agreement for Families	HABC	<ul style="list-style-type: none">Changed the max term for a repayment agreement from 18 months to 24 months.	<ul style="list-style-type: none">Payment agreements will follow the schedule below; however, HABC reserves the right to modify the maximum term on a case by case basis.		
				Initial Payment Due: (% of Total) Amount	Amount Owed	Maximum Term
				25%	0 - \$500	6 months
				25%	\$501- \$1,000	10 months
				50%	\$1,001 - \$2,500	18 24 months
Appendices						
44.	Appendix G: Over-Income Limits	HOTMA 2016	<ul style="list-style-type: none">Added the over-income limits prescribed by HUD for 2019	<ul style="list-style-type: none">Over income limits by family size are found in Appendix G		