



## Housing Choice Voucher Program

### FY2020 Annual Plan | HCVP Administrative Plan Amendments

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY
<p>All references to Baltimore Housing have been updated to reflect HABC.</p> <p>All website URL's referencing <a href="http://www.baltimorehousing.org">www.baltimorehousing.org</a> have been updated to reflect <a href="http://www.HABC.org">www.HABC.org</a>.</p> <p>All references to the Thompson Partial Consent Decree have been updated to refer to Thompson Settlement Agreement.</p>	<p>Anywhere &amp; Everywhere</p>	<p>Housing Authority of Baltimore City (HABC) is no longer affiliated with Baltimore Housing.</p> <p>All references to Baltimore Housing have been removed and updated to reflect current business names, addresses, and practices.</p> <p>All references to the Thompson Partial Consent Decree have been updated to refer to Thompson Settlement Agreement.</p>

## Chapter 1: STATEMENT OF POLICIES AND OBJECTIVES

<p><b><u>1.2 HABC MISSION AND VISION STATEMENT</u></b></p> <p>Through participation of its many stakeholders – staff, residents, applicants and residential property owners – provide quality housing and related services in a professional manner, emphasizing self-sufficiency within safe, caring, and affordable environments.</p>	1-1	<p>Update statements to match new directives and current mission/vision statements:</p> <p><del>Through participation of its many stakeholders – staff, residents, applicants and residential property owners – provide quality housing and related services in a professional manner, emphasizing self-sufficiency within safe, caring, and affordable environments. To create and provide quality affordable housing opportunities in sustainable neighborhoods for the people we serve.</del></p> <p><i>To create diverse and vibrant communities; to provide opportunities for self-sufficiency; and to build pathways for strong partnerships.</i></p>
<p><b><u>1.3 GOALS</u></b></p> <p>No current language</p>	1-1 to 1-2	<p>Added a section “1.3.1 The Four C’s of HABC”</p> <p><i>Community, Collaboration, Customer Service and Communication</i></p>
<p><b><u>1.8 FAIR HOUSING POLICY</u></b></p> <p>Pursuant to Section 808 (e) (5) of the Fair Housing Act, HUD requires its funding recipients to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability and familial status. The purposed FSS Coordinator, if funded, shall affirmatively further fair housing by...</p> <p>...Record keeping will include, but not be limited to, the race, ethnicity, familial status, and disability status of program participants.</p>	1-4 to 1-5	<p>Updating language to match protected classes as identified by HUD:</p> <p>Pursuant to Section 808 (e) (5) of the Fair Housing Act, HUD requires its funding recipients to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include <i>race, color, sex, religion, national origin, ancestry, age, familial status, marital status, handicap or disability, sexual orientation, or gender identity</i> <del>race, color, national origin, religion, sex, disability and familial status</del>. The purposed FSS Coordinator, if funded, shall affirmatively further fair housing by...</p> <p>...Record keeping will include, but not be limited to, the <i>race, color, sex, religion, national origin, ancestry, age, familial status, marital status, handicap or disability, sexual orientation, or gender identity</i> <del>race, color, national origin, religion, sex, disability and familial status</del> status of program participants.</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 1: STATEMENT OF POLICIES AND OBJECTIVES (Continued)

<p><b><u>1.10 REASONABLE ACCOMMODATION POLICY</u></b></p> <p><b>1.10.2 Applying for Admission</b> All persons who wish to apply for any of HABC's programs must submit a written application that is available under the "Housing Choice Voucher Program" link on the Baltimore Housing website (baltimorehousing.org), by phone, at the Housing Choice Voucher Program Offices or other agency locations. Accommodations for applications will be made upon request from a person with a disability.</p>	1-9	<p>Removed any reference to a written application for assistance, HABC no longer accepts written applications – online only:</p> <p><del>All persons who wish to apply for any of HABC's programs must submit a written application that is available under the "Housing Choice Voucher Program" link on the Baltimore Housing website (baltimorehousing.org), by phone, at the Housing Choice Voucher Program Offices or other agency locations.</del> Accommodations for applications will be made upon request from a person with a disability. <i>For more information on applying for admission to the HCV Program, please refer to Chapter 3.</i></p>
<p><b><u>1.12 HCV PROGRAM MANAGEMENT ASSESSMENT OBJECTIVES</u></b></p> <p>The annual sample of files and records will be drawn in a random manner and provide a clear audit trail. The minimum sample size to be reviewed will relate directly to each indicator. The internal auditor reporting to HABC's Internal Audits and Investigation Unit (IAIU) shall conduct an annual review to ensure that this process is being followed.</p>	1-10	<p>Removed reference to IAIU. Internal auditors report to Executive Management.</p> <p>The annual sample of files and records will be drawn in a random manner and provide a clear audit trail. The minimum sample size to be reviewed will relate directly to each indicator. The internal auditor <del>reporting to HABC's Internal Audits and Investigation Unit (IAIU)</del> shall conduct an annual review to ensure that this process is being followed.</p>
<p><b><u>1.15 FAMILY OUTREACH</u></b></p> <p>Combined Family and Owner Outreach into one Outreach section.</p> <p><b><u>1.16 OWNER OUTREACH</u></b></p>	1-12	<p>Combined sections under <b><u>1.15 OUTREACH</u></b>. No new language added or revised.</p> <p><i>1.15.1 Family Outreach and 1.15.2 Owner Outreach</i></p>

## Chapter 2: ELIGIBILITY FOR ADMISSION

<p><b><u>2.2 ELIGIBILITY FACTORS</u></b></p> <p>...HUD eligibility criteria are:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• No family member has committed drug-related, violent, or other criminal activity within the last three years...</li> </ul>	2-1	<p>Updated language to reflect HUD language verbatim:</p> <p>...HUD eligibility criteria are:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• No family member has committed drug-related, violent, or other <i>serious</i> criminal activity within the last three years...</li> </ul>
<p><b><u>2.3 FAMILY COMPOSITION</u></b></p> <p><b>2.3.4 Co-Head</b> The co-head is an individual in the household who is equally responsible with the head of household for ensuring the family fulfills all of its responsibilities under the Program, but who is not the spouse. A household may have either a spouse or co-head, but not both. A co-head never qualifies as a dependent.</p>	2-3	<p>Added last sentence:</p> <p>...A household may have either a spouse or co-head, but not both. A co-head never qualifies as a dependent, <i>and may not retain or receive a voucher while listed as a co-head on someone else's voucher. Co-heads must separately apply when the waiting list is open to receive their own, separate assistance.</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 2: ELIGIBILITY FOR ADMISSION (Continued)

<p><b><u>2.3 FAMILY COMPOSITION</u></b></p> <p><b>2.3.9 Live-In Aides</b></p> <p>A live-in aide is not considered to be an assisted family member and has no rights or benefits under the Program:</p> <ul style="list-style-type: none"> <li>...</li> </ul> <p>...Household members already listed on the lease who will remain in the unit will not be removed from the lease for purposes of becoming a live-in aide.</p> <p>...HABC will require the live-in aide to execute an acknowledgment form in which the live-in aide agrees to abide by the terms and conditions of HCVP's family obligations. By signing the acknowledgement form, the live-in aide also agrees that the status as a live-in aide does not make the person a HCVP participant or give the person rights as a HCVP participant.</p>	2-4 to 2-5	<p>Adding a bullet to clarify live-in aides and rights to voucher.</p> <ul style="list-style-type: none"> <li>...</li> <li><i>If approved, only the live-in aide can reside in the unit with the applicant household. No other member of the live-in aide's family can live in the assisted unit.</i></li> </ul> <p>...Household members already listed on the lease who will remain in the unit will not be removed from the lease for purposes of becoming a live-in aide. <i>Household members removed from the voucher may not be added back to the household as a live-in aide for a period of 12-months from the date of removal. Prior household members, who are being added back to the household as a live-in aide, after the required timeframe, will require HABC approval.</i></p> <p>...By signing the acknowledgement form, the live-in aide also agrees that the status as a live-in aide does not make the person a HCVP participant or give the person rights as a HCVP participant. <i>Live-in aides who are denied admission are not eligible to request informal reviews or hearings.</i></p>
<p><b><u>2.3 FAMILY COMPOSITION</u></b></p> <p><b>2.3.10 Guests</b></p> <p>...Guests who remain in a unit beyond this period are considered unauthorized occupants, which constitutes a violation of Family Obligations and may result in the termination of assistance...</p>	2-5 to 2-6	<p>Copying language from Chapter 15 sections on Guests and Visitors, to clarify language on unauthorized occupancy determinations:</p> <p>... Guests who remain in a unit beyond this period are considered <i>an</i> unauthorized occupant, which constitutes a violation of Family Obligations and may result in the termination of assistance...</p> <p><i>Determination of unauthorized status will include any of the following:</i></p> <ul style="list-style-type: none"> <li><i>Absence of evidence of any other address will be considered verification that the visitor is a member of the household.</i></li> <li><i>Statements from neighbors and/or the landlord will be considered in making the determination.</i></li> <li><i>Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</i></li> <li><i>Investigations completed by HABC's Internal Investigations Unit (IIU), may result in the determination of unauthorized occupants.</i></li> </ul>
<p><b><u>2.3 FAMILY COMPOSITION</u></b></p> <p><b>2.3.11 Visitors</b></p> <p>Determination of the unauthorized status will include any of the following:</p> <ul style="list-style-type: none"> <li>Absence of evidence of any other address will be considered verification that the visitor is a member of the household.</li> <li>Statements from neighbors and/or the landlord will be considered in making the determination.</li> <li>Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</li> </ul>	2-6	<p>Adding last bullet to match unauthorized occupant regs for guests:</p> <ul style="list-style-type: none"> <li>Absence of evidence of any other address will be considered verification that the visitor is a member of the household.</li> <li>Statements from neighbors and/or the landlord will be considered in making the determination.</li> <li>Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</li> <li><i>Investigations completed by HABC's Internal Investigations Unit (IIU), may result in the determination of unauthorized occupants.</i></li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 2: ELIGIBILITY FOR ADMISSION (Continued)

<p><b><u>2.3 FAMILY COMPOSITION</u></b></p> <p><b>2.3.12 Split Households Prior to Voucher Issuance</b></p> <p>When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation, and the new families both claim the same placement on the waiting list, and there is no court determination, HABC makes the final decision taking into consideration the following factors:</p> <ul style="list-style-type: none"> <li>• Which family unit retains the children or any disabled or elderly members;</li> <li>• Recommendations of Social Service Agencies</li> <li>• Which family member applied as head of household.</li> </ul> <p>In special voucher issuances, the following will be taken into consideration:</p> <ul style="list-style-type: none"> <li>• Families with three (3) or more generations (i.e. grandmother, mother, child).</li> <li>• Families that qualify as hard to house under HUD guidelines.</li> </ul>	<p>2-6</p>	<p>Revising language to match procedure:</p> <p>When a family on the waiting list splits into two otherwise eligible families due to divorce or legal separation, and the new families both claim the same placement on the waiting list, and there is no court determination, HABC makes the final decision taking into consideration the following factors, <i>in order</i>:</p> <ul style="list-style-type: none"> <li>• <i>Which family member applied as the head of the household;</i></li> <li>• Which family unit retains the children or any disabled or elderly members;</li> <li>• <i>Restrictions that were in place at the time the family applied;</i></li> <li>• <i>The role of domestic violence in the split; and/or</i></li> <li>• Recommendations of Social Service Agencies <i>or qualified professionals such as children's protective services.</i></li> <li>• <del>Which family member applied as head of household.</del></li> </ul> <p><i>Documentation of these factors is the responsibility of the applicant families. If either or both of the families do not provide the documentation, HABC may deny their placement on the waiting list for failure to supply information requested by HABC.</i></p> <p><del>In special voucher issuances, the following will be taken into consideration:</del></p> <ul style="list-style-type: none"> <li>• <del>Families with three (3) or more generations (i.e. grandmother, mother, child).</del></li> <li>• <del>Families that qualify as hard to house under HUD guidelines.</del></li> </ul>
<p><b><u>2.3 FAMILY COMPOSITION</u></b></p> <p><b>2.3.14 Joint Custody of Dependents</b></p> <p>Dependents subject to a joint custody arrangement that live with one parent at least 51% of the time will be considered members of the household. "51% of the time" is defined as one hundred and eighty-three (183) days of the year, which do not have to run consecutively.</p> <p>When both parents are on the Waiting List and both are trying to claim a child, the parent whose address is listed in the school records will be allowed to claim the school-age child as a dependent.</p> <p>When more than one participant claims the same dependent(s) as a family member, the participant with primary custody at the time of the initial examination or reexamination will be able to claim the dependent(s).</p>	<p>2-6 to 2-7</p>	<p>Added language regarding temporary guardianship and revised section to match current policy:</p> <p><b>2.3.14 Joint Custody <i>and/or Temporary Guardianship</i> of Dependents</b></p> <p>Dependents subject to a joint custody arrangement that live with one <del>parent</del> <i>person</i> at least 51% of the time will be considered members of the household...</p> <p><i>A self-certification is required of families who claim joint custody or temporary guardianship.</i></p> <p>...the parent whose address is listed in the <i>child's</i> school records <del>will be</del> <i>is</i> allowed to claim the school-age child as a dependent.</p> <p><i>In cases in which parents have joint custody of a child or children (50/50 custody), HABC grants the child deduction to the household of record provided by Baltimore City Public Schools or a private school. If the child is residing outside of HABC's jurisdiction, due to joint custody, the principal household of record provided by the applicable school system is used to determine family composition, living arrangements and the standard deduction.</i></p> <p><i>If the child is not enrolled in school, HABC will rely upon official records from daycare providers, tax records, and insurance providers such as Medicaid.</i></p> <p>When more than one participant (<i>already on the program</i>) claims the same dependent(s) as a family member...</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 2: ELIGIBILITY FOR ADMISSION (Continued)

<p><b><u>2.6 CITIZENSHIP/ELIGIBLE IMMIGRATION STATUS</u></b></p> <p><b>2.6.1 Verification of Status before Admission</b></p> <p>HABC will not provide assistance to families prior to the verification of eligibility for the individual, or at least one member of the family pursuant to this section.</p>	2-9	<p>Added last sentence to match current policy:</p> <p>HABC will not provide assistance to families prior to the verification of eligibility for the individual, or at least one member of the family pursuant to this section. <i>Applicants must submit required evidence of citizenship or eligible immigration status.</i></p>
<p><b><u>2.7 OTHER CRITERIA FOR ADMISSIONS</u></b></p> <p>All applicants will be processed in accordance with the MTW Agreement.</p> <p>Applicants may not be admitted to the program if any member of the family has been evicted from federally assisted housing in the last five (5) years <u>(24 CFR § 982.552(c) (1) (ii))</u>.</p> <p>A family will be denied admission to the program if any member of the family fails to sign and submit consent forms for obtaining information required by HABC, including Form HUD-9886 or HABC equivalent <u>(24 CFR § 982.552(b) (3))</u>.</p> <p>HABC will apply the following criteria, in addition to the HUD eligibility criteria, as grounds for denial of admission to the program <u>(24 CFR § 982.552)</u>:</p> <ol style="list-style-type: none"> <li>1. The family must not have violated any family obligation (see <u>24 CFR § 982.551</u>) during a previous participation in the HCV program <u>(24 CFR § 982.552(c) (1) (ii))</u>, or if for three years prior to final eligibility determination.</li> <li>2. ...</li> </ol> <p>...The criminal history check will be performed at initial eligibility determination as well as at every re-examination thereafter.</p> <p>If any applicant deliberately misrepresents the information on which eligibility or tenant rent is established, HABC will deny assistance and may refer the family file/record to the proper authorities for appropriate disposition. (See Program Integrity Addendum)</p> <p>Debts owed to HABC and information regarding termination from a federally assisted housing program will be maintained in EIV for a period of up to ten (10) years from the end of participation date.</p>	2-9 to 2-10	<p>Revised to match HUD regs verbatim and current policy:</p> <p>All applicants will be processed in accordance with the MTW Agreement.</p> <p><u>A family will be denied admission to the program if any member of the family fails to sign and submit consent forms for obtaining information required by HABC, including Form HUD-9886 or HABC equivalent (24 CFR § 982.552(b) (3)).</u></p> <p>Applicants may not be admitted to the program if any member of the family has been evicted from federally assisted housing in the last five (5) years <u>(24 CFR § 982.552(c) (1) (ii))</u>.</p> <p>HABC will apply the following criteria...:</p> <ol style="list-style-type: none"> <li>1. The family must not have violated any family obligation (see <u>24 CFR § 982.551</u>) during a previous participation in the HCV program <u>(24 CFR § 982.552(c) (1) (ii))</u>, or if for three years prior to final eligibility determination <i>any member of the applicant household has been evicted from federally assisted housing for drug-related criminal activity (24 CFR § 982.553(a)(1)). However, HABC may admit the household if it is determined that:</i> <ul style="list-style-type: none"> <li>• <i>The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program (documentation must be provided and approved by HABC); or</i></li> <li>• <i>That the circumstances leading to eviction no longer exist (for example, the criminal household member has died or is imprisoned).</i></li> </ul> </li> <li>2. ...</li> </ol> <p>...The criminal history check will be performed at initial eligibility determination <i>as well as and</i> at every re-examination thereafter.</p> <p>...to the proper authorities for appropriate disposition. (See Program Integrity Addendum) <i>If an applicant commits fraud, the applicant and the applicant's family may be prohibited from receiving future rental assistance for a period of up to 10 years and may be subject to prosecution by the local, state, or Federal prosecutor, which may result in being fined up to \$10,000 and/or serving time in jail.</i></p> <p>Debts owed to HABC...maintained in <i>the Enterprise Income Verification (EIV) system</i> for a period of up to ten (10) years from the end of <i>the household's</i> participation date.</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 2: ELIGIBILITY FOR ADMISSION (Continued)

<p><b><u>2.11 PROHIBITED ADMISSIONS CRITERIA</u></b></p> <p>Admission to the program may not be based on:</p> <ol style="list-style-type: none"> <li>1. Where a family lives prior to admission to the program.</li> <li>2. Where the family will live with assistance under the program.</li> <li>3. Discrimination because members of the family are unwed parents, recipients of public assistance, or children born out of wedlock.</li> <li>4. Discrimination because a family includes children.</li> <li>5. Whether a family decides to participate in a family self-sufficiency program; or</li> <li>6. Other reasons as listed in the "Statement of Policies and Objectives" chapter under the Fair Housing and Reasonable Accommodations sections.</li> </ol>	2-12 to 2-13	<p>Revised to match HUD language and current policy:</p> <p>Admission to the program may not be based on:</p> <ol style="list-style-type: none"> <li>1. Where a family lives prior to admission to the program. <i>However, HABC may adopt residency preference (see Chapter 4) to target assistance for families meeting specific criteria.</i></li> <li>2. Where the family will live with assistance under the program.</li> <li>3. <i>Family characteristics, examples include:</i> <ol style="list-style-type: none"> <li>a. Discrimination because members of the family are unwed parents, recipients of public assistance, or children born out of wedlock.</li> <li>b. <i>Discrimination because a family includes children (familial status discrimination).</i></li> <li>c. <i>Discrimination because of age, race, color, religion, sex, or national origin.</i></li> <li>d. <i>Discrimination because of a disability</i></li> </ol> </li> <li>4. <del>Discrimination because a family includes children.</del></li> <li>5. Whether a family decides to participate in a family self-sufficiency program; or</li> <li>6. Other reasons as listed in the "Statement of Policies and Objectives" chapter under the Fair Housing and Reasonable Accommodations sections.</li> </ol>
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## Chapter 3: APPLYING FOR ADMISSION

<p><b><u>3.2 OVERVIEW OF THE APPLICATION TAKING PROCESS</u></b></p> <p><b>3.2.1 Initial applications</b></p> <p>Eligibility factors (see Chapter 2, Section 2.2 for additional factors) to be verified:</p> <ol style="list-style-type: none"> <li>1. Applicant name indicates the designated head of household;</li> <li>2. Family composition in order to determine the number of bedrooms for which the family qualifies under HABC's occupancy standards;</li> <li>3. Local preference (see Chapter 4, Section 4.3);</li> <li>4. Racial and Ethnic designation of the head of household;</li> <li>5. ...</li> </ol>	3-1	<p>Added summary paragraph for Section 3.2:</p> <p><i>The application process will involve two phases, the initial application and the eligibility determination. These phases are described in the following sections (3.2.1 and 3.2.2) in further detail.</i></p> <p>Removed line #4 from eligibility factors. Per HUD this form is no longer required:</p> <p>Eligibility factors (see Chapter 2, Section 2.2 for additional factors) to be verified:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. ...</li> <li>3. ...</li> <li>4. <del>Racial and Ethnic designation of the head of household;</del></li> <li>5. ...</li> </ol>
<p><b><u>3.3 OPENING THE WAITING LIST</u></b></p> <p>The waiting list shall be open for the period necessary to cover projected turnover and new allocations over the next twelve (12) months.</p>	3-2	<p>Added statement to end of paragraph regarding partially open waiting lists:</p> <p>The waiting list shall be open for the period necessary to cover projected turnover and new allocations over the next twelve (12) months. <i>HABC may keep the waiting list partially open only for particular preferences. The decision to keep a waiting list partially open will be made by the Executive Director with approval by the Board of Commissions, and based on need.</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

Chapter 3: APPLYING FOR ADMISSION (Continued)		
<p><b><u>3.7 APPLICATION COMPLETION AND INTERVIEW</u></b></p> <p><b>3.7.1 Requirement to Attend Interview</b></p> <p>Applicants are required to attend an interview.</p> <p>HABC will verify applicant information, conduct eligibility screening and then make a determination about the applicant's eligibility for assistance. Screening will be carried out in accordance with the policies in this Administrative Plan.</p> <p>Applicants will be sent an eligibility appointment letter when they reach the top of the waiting list. The letter scheduling the interview will identify the documents the applicant is required to bring to the interview and the factors to be verified...</p> <p>...</p> <p>If HABC is unable to reach the applicant, or the applicant misses two scheduled appointments, HABC will withdraw the application from the waiting list after attempting to reach the applicant via all of the contact information provided by the applicant.</p>	3-4 to 3-5	<p>Moved some language and clarified process:</p> <p>Applicants are required to attend an interview, <i>unless a reasonable accommodation has been requested and approved. Applicants will be sent an eligibility appointment letter when they reach the top of the waiting list. The letter scheduling the interview will identify the documents the applicant is required to bring to the interview and the factors to be verified.</i></p> <p><i>During the interview,</i> HABC will verify applicant information, conduct eligibility screening and then make a determination about the applicant's eligibility for assistance. Screening will be carried out in accordance with the policies in this Administrative Plan.</p> <p><del>Applicants will be sent an eligibility appointment letter when they reach the top of the waiting list. The letter scheduling the interview will identify the documents the applicant is required to bring to the interview and the factors to be verified...</del></p> <p>...</p> <p>If HABC is unable to reach the applicant, or the applicant misses two scheduled appointments, HABC will withdraw the application from the waiting list <del>after attempting to reach the applicant via all of the contact information provided by the applicant.</del></p>
<p><b><u>3.9 FINAL DETERMINATION AND NOTIFICATION OF ELIGIBILITY</u></b></p> <p>...Applicants will be denied assistance and removed from the list for the following reasons:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• The applicant is no longer eligible for the tenant-based program as a result of program selection verification that is conducted within sixty (60) calendar days of anticipated voucher issuance. (Note: the application is not removed from the waiting list based on preference change).</li> <li>• ...</li> <li>• ...</li> <li>• The applicant is a current participant in HABC's voucher program. HABC may not take any of the following actions because an applicant has applied for, or refused other housing assistance: <ul style="list-style-type: none"> <li>○ ...</li> <li>○ Deny admission preference for which the applicant is otherwise qualified.</li> <li>○ Remove the applicant from another waiting list.</li> </ul> </li> </ul>	3-6	<p>Added clarifying language to match current policy:</p> <p>...Applicants will be denied assistance and removed from the list for the following reasons:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• The applicant is no longer eligible for the tenant-based program as a result of program selection verification that is conducted within sixty (60) calendar days of anticipated voucher issuance. (Note: the application is not removed from the waiting list based on preference change, <i>but the preference will be changed and the application re-sequenced accordingly</i>).</li> <li>• ...</li> <li>• ...</li> <li>• The applicant is a current participant in HABC's voucher program. <i>However,</i> HABC may not take any of the following actions because an applicant has applied for, or refused other housing assistance: <ul style="list-style-type: none"> <li>○ ...</li> <li>○ Deny admission preference for which the applicant is otherwise qualified.</li> <li>○ <i>If an applicant has applied for and receives assistance, but still has applications for other programs under the same type of assistance, they will be removed from those waiting lists for which they are already receiving the same type of assistance.</i></li> <li>○ <del>Remove the applicant from another waiting list.</del></li> </ul> </li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

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## Chapter 4: ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST

<p><b><u>4.3 ORDER OF SELECTION</u></b></p> <p>NO CURRENT POLICY</p>	4-3	<p>Added new policy regarding <b>Mainstream Voucher Program</b>. Policy was approved by Board of Commissioners on Nov. 28, 2018. New Section under 4.3 ORDER OF SELECTION:</p> <p><b><i>4.3.4 Mainstream Voucher Program</i></b></p> <p><i>In late 2018, HABC was awarded funding by HUD to support issuing eighty-nine (89) tenant-based vouchers through the Mainstream Voucher Program.</i></p> <p><i>The Mainstream Voucher Program will provide assistance to non-elderly persons with disabilities that qualify for any one of the following preference categories:</i></p> <ol style="list-style-type: none"> <li><i>1. Transitioning out of institutional or other segregated settings;</i></li> <li><i>2. At serious risk of institutionalization;</i></li> <li><i>3. Homeless; or</i></li> <li><i>4. At risk of becoming homeless.</i></li> </ol> <p><i>The target beneficiaries or voucher recipients for the Mainstream Voucher Program under this award are any household that includes one or more non-elderly persons with disabilities, who fall under one of the above-listed preferences. The Residency Preference will continue to apply, meaning there will be a preference for non-elderly persons with disabilities residing in Baltimore City to receive the available HCVs.</i></p> <p><i>HABC will screen its current tenant-based waiting lists for applicants meeting the preferences defined within this subsection. Applicants who meet the non-elderly disabled qualifications will be asked to come in to HCVP's office for eligibility determination and to verify and apply preferences if applicable. In addition to screening the current tenant-based waiting list, HABC will accept referrals from partner agencies who have existing clients meeting these preferences.</i></p> <p><i>HABC will continue issuing vouchers under this program until all 89 vouchers have been issued, and as necessary to fill turnover vouchers to ensure full utilization of the Mainstream Voucher Program.</i></p>
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FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

--	--	--

## Chapter 4: ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST (Continued)

<p><b><u>4.3 ORDER OF SELECTION</u></b></p> <p>NO CURRENT POLICY</p>	4-4	<p>Added new policy regarding <b>Choice Mobility Program</b>. Policy was approved by Board of Commissioners on Jan. 2, 2019. New Section under 4.3 ORDER OF SELECTION:</p> <p><i><b>4.3.7 Choice Mobility Preference for Residents of RAD Properties</b></i></p> <p><i>HABC provides residents living in properties that converted under the Rental Assistance Demonstration (RAD) program a Choice Mobility option. Under Choice Mobility, a resident of RAD will have the opportunity to request a HCV, which may be used to move to a rental unit in the private rental market. This preference will be applied to residents that select the Choice Mobility option as they are added or screened from HCVP's tenant-based waiting lists. Only residents living in HABC RAD properties will be eligible to move with a tenant-based voucher under this preference, and they'll only be able to move the later of:</i></p> <ul style="list-style-type: none"> <li><i>• 24 months from the date of execution of the HAP Contract for the RAD property in which they live; or</i></li> <li><i>• 24 months after the resident's move-in date at the RAD property.</i></li> </ul> <p><i>Residents wishing to exercise the RAD Choice Mobility option must meet all HCVP eligibility criteria, including the program income requirements and the screening criteria, in effect at the time of the tenant-based voucher issuance.</i></p>
<p><b><u>4.3 ORDER OF SELECTION</u></b></p> <p><b>4.3.8 Preference Denial and Appeal</b></p> <p>...If the preference denial is upheld as a result of the information review, or if the applicant does not request an informal review, the applicant will be placed on the waiting list without the benefit of the preference. However, if at the time the family applies the waiting list is only open to families who claim that preference...</p>	4-4	<p>Section # updated as result of previous additions mentioned above. Revised wording:</p> <p><b>4.3.810 Preference Denial and Appeal</b></p> <p>...If the preference denial is upheld as a result of the information review, or if the applicant does not request an informal review, the applicant will be <del>placed on</del> <i>returned to</i> the waiting list without the benefit of the preference. However, if at the time the family applies <i>while</i> the waiting list is only open to families who claim that preference...</p>
<p><b><u>4.4 UPDATING THE WAITING LIST</u></b></p> <p>Applicants are required to inform HABC online via the Applicant Portal, or through alternative methods of changes in address.</p>	4-4 to 4-5	<p>Section # updated as result of previous additions mentioned above. Revised wording:</p> <p>Applicants are required to inform HABC online <u>of changes in address</u> via the Applicant Portal, or through alternative methods <del>of changes in address</del> <i>(i.e. in writing to, or by visiting the HCVP Office to report such changes)</i>.</p> <p>Copied language from Section 4.5 REINSTATEMENT TO THE WAITING LIST, that should be included in this section:</p> <p><i>In addition, if the applicant did not respond to HABC's update questionnaire because of a disability, HABC will reinstate the applicant in the applicant's former position on the Waiting List. Their placement on the Waiting List will be based on their original preference on the original application, as long as the original preference is still applicable.</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

--	--	--

#### Chapter 4: ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST (Continued)

<p><b><u>4.6 SET-ASIDE OF VOUCHERS FOR FAMILIES WITH DISABILITIES</u></b></p> <p>SECTION MOVED TO 4.9</p>	4-5 to 4-6	<p>This entire section was moved from 4.6 to 4.9 to keep in sequence with other sections on set-aside programs.</p>
<p><b><u>4.10 SET-ASIDE VOUCHERS FOR FAMILIES WITH CHILDREN WITH ELEVATED BLOOD LEAD LEVELS</u></b></p> <p>Subject to availability of funding two hundred and fifty (250) Housing Choice Vouchers will be set-aside for issuance to families with children with elevated blood levels as determined and referred by the Baltimore City Health Department, the Maryland Department of the Environment or other appropriate agency.</p>	4-7 to 4-8	<p>Referrals are coming from a new agency:</p> <p>Subject to availability of funding, two hundred <del>and</del> fifty (250) Housing Choice Vouchers will be set-aside for issuance to families with children with elevated blood levels as determined and referred by <del>the Baltimore City Health Department</del> <i>Green and Healthy Homes, Inc. (GHHI)</i>, the Maryland Department of the Environment, or other appropriate agency.</p>
<p>NO CURRENT POLICY</p>	4-8	<p>Adding new section for HEALTHY OPPORTUNITIES PROGRAM vouchers set-aside for a new activity proposed as MTW initiative in FY2020:</p> <p><b><u>4.14 SET-ASIDE VOUCHERS FOR HEALTHY OPPORTUNITIES PROGRAM</u></b></p> <p><i>In FY2020, HABC proposed to HUD to set aside vouchers to assist current Housing Choice Voucher families with children who are facing health related issues due to their current living situations. In this proposal, and subject to HUD approval, HCVP will assist families with moving into opportunity neighborhoods that would improve the families overall health. Families will be identified by HABC's partner agencies that specialize in the health industry, and opportunity areas may differ based on the needs of each participating family. These vouchers are only for families who are willing to move to opportunity areas to improve their overall health. HABC will evaluate the results of this program and may select new participants upon turnover.</i></p>
<p><b><u>4.14 SPECIAL HUD FUNDING FOR VASH VOUCHERS</u></b></p> <p>HABC was awarded four hundred and seventy-six (476)* Veterans Supportive Housing (VASH) vouchers...</p>	4-8	<p><u>Section # updated (4.15) with additions of new policies.</u></p> <p>In 2018, HUD awarded an additional 50 vouchers to HABC for its HUD-VASH program. Updating the number of vouchers awarded:</p> <p>HABC was awarded <del>four</del> <i>five</i> hundred <del>and seventy</del> <i>twenty</i>-six (476 <del>526</del>)* Veterans Supportive Housing (VASH) vouchers...</p>
<p><b><u>4.15 SPECIAL HUD FUNDING FOR VOUCHERS FOR NEDS</u></b></p> <p>HABC was awarded forty (40) vouchers, funded through a grant from HUD, to provide rental assistance to non-elderly persons with disabilities who are transitioning into the community from nursing homes or other health care institutions. Referrals are received from the Maryland Department of Health and Mental Hygiene under Medicaid's Money Follows the Person (MFP) program...</p>	4-8 to 4-9	<p><u>Section # updated (4.16) with additions of new policies.</u></p> <p>Referrals are coming from a new agency:</p> <p>Subject to availability of funding, two hundred <del>and</del> fifty (250) Housing Choice Vouchers will be set-aside for issuance to families with children with elevated blood levels as determined and referred by <del>the Baltimore City Health Department</del> <i>Green and Healthy Homes, Inc. (GHHI)</i>, the Maryland Department of the Environment, or other appropriate agency.</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 4: ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST (Continued)

NO CURRENT POLICY	4-9	<p>Adding new section for MAINSTREAM VOUCHER PROGRAM:</p> <p><b><u>4.18 SPECIAL HUD FUNDING FOR MAINSTREAM VOUCHERS</u></b></p> <p><i>HABC was awarded eighty nine (89) vouchers funded through a competitive process approved by HUD to provide rental assistance to households that include non-elderly/disabled (NED) persons who are:</i></p> <ol style="list-style-type: none"> <li><i>1. Transitioning out of institutional or other segregated setting;</i></li> <li><i>2. At serious risk of institutionalization;</i></li> <li><i>3. Currently homeless;</i></li> <li><i>4. At risk of becoming homeless.</i></li> </ol> <p><i>Applicants are referred through partner agencies, as well as pulled from the existing waiting list for preference verification to determine if they meet the preferences of this special program.</i></p>
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## Chapter 5: SUBSIDY STANDARDS

<p><b><u>5.3 PARAMETERS FOR DETERMINATION OF VOUCHER SIZE</u></b></p> <p>Generally, HABC assigns one bedroom to two people; however, the following guidelines may apply:</p> <ul style="list-style-type: none"> <li>...</li> <li>...</li> <li>In the case where a family member has been called to active duty, the family composition will remain unchanged even if the family member is absent from the unit for more than six (6) months. After one (1) year, HABC may reevaluate the situation and may take action to ensure the voucher size is relevant to the family composition.</li> </ul>	5-2	<p>Adding statement to last bullet to clarify the process when active duty household members are removed and added back to the voucher:</p> <ul style="list-style-type: none"> <li>...</li> <li>...</li> <li>In the case where a family member has been called to active duty, the family composition will remain unchanged even if the family member is absent from the unit for more than six (6) months. After one (1) year, HABC may reevaluate the situation and may take action to ensure the voucher size is relevant to the family composition. <i>If the active duty member is removed from the household and returns at a later date, the household is required to report the update in family composition. HABC may re-evaluate and take action to ensure the voucher size and household income are relevant to the updated family composition and rent share.</i></li> </ul>
<p><b><u>5.4 EXCEPTIONS TO SUBSIDY STANDARDS</u></b></p> <p>...When a change in family composition requires a larger voucher size and no funds are available, the family will be issued the next available voucher change.</p>	5-3	<p>Adding statement regarding limited funding instances and over-housed family process:</p> <p>...When a change in family composition requires a larger voucher size and no funds are available, the family will be issued the next available voucher <del>change</del> <i>when funding becomes available.</i></p> <p><i>If a unit does not meet HABC subsidy standards due to a decrease in family size (i.e. the unit is too large, the family is over-housed), HABC will notify the family in writing that they are over-housed, and may require the participant to move to an appropriate size unit or pay additional costs including increases for utilities and additional rooms.</i></p>
<p><b><u>5.5 UNIT SIZE SELECTED</u></b></p> <p>The family unit size as determined for a family under HABC subsidy standards for a family assisted in the voucher program is based on HABC's adopted payment standards...</p>	5-4	<p>Revising statement to read more clearly:</p> <p>The family unit size (<i>voucher size</i>) as determined for a family under <i>the</i> HABC subsidy standards <i>is used to determine the maximum rent subsidy for a family assisted in the voucher program. For a voucher tenancy, HABC establishes payment standards by number of bedrooms for a family assisted in the voucher program is based on HABC's adopted payment standards...</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 6: FACTORS RELATED TO TOTAL TENANT PAYMENT (TTP) AND FAMILY SHARE DETERMINATION

<p><b><u>6.1 INTRODUCTION</u></b></p> <p>...</p> <p>This Chapter defines income, allowable expenses and deductions, total tenant payments, minimum rent, the earned income disregard (EID) for persons with disabilities, contributions and other expenses to be subtracted from income and how the presence or absence of household members may affect the Total Tenant Payment (TTP).</p>	6-1	<p>Revised 2<sup>nd</sup> paragraph to match the order of each section as it appears in the Chapter:</p> <p>This Chapter defines <i>Total Tenant Payment (TTP)</i>, <i>minimum rent</i>, <i>income and allowances</i>, allowable expenses and deductions, <del>total tenant payments, minimum rent, the earned income disregard (EID) for persons with disabilities, and</del> contributions and other expenses to be subtracted from income. <i>It also defines and</i> how the presence or absence of household members may affect the Total Tenant Payment (TTP).</p>
<p><b><u>6.2 DETERMINING TOTAL TENANT PAYMENT (TTP)</u></b></p> <p>The Total Tenant Payment (TTP) is the total amount that HABC's rent formula requires the participant to pay toward gross rent (the sum of the rent to owner and utility allowance; if there is no utility allowance, the rent to owner equals the gross rent).</p> <p>Total Tenant Payment is the highest of the following amounts, rounded to the nearest dollar:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. ...</li> <li>3. ...</li> <li>4. ...</li> </ol>	6-1	<p>Revised language to make it more understandable and added statement regarding what annual income is used for:</p> <p>The Total Tenant Payment (TTP) is the total <i>household share of rent including amount that HABC's rent formula requires the participant to pay toward gross rent (the sum of the rent to owner and utility allowance; if there is no utility allowance, the rent to owner equals the gross rent).</i></p> <p><del>Total Tenant Payment</del> <i>TTP</i> is the highest of the following amounts, rounded to the nearest dollar:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. ...</li> </ol> <p><i>Annual income (see Annual Income in Section 6.4.1) is used to determine whether or not applicants are within the applicable income limits and for the purposes of calculating TTP both at new admissions and during reexaminations.</i></p>
<p><b><u>6.4 INCOME AND ALLOWANCES</u></b></p> <p><b>6.4.1 Annual Income</b></p> <p>...Annual income includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• The full amount, before any payroll deductions...</li> <li>• ...</li> <li>• ...</li> <li>• If the family has net family assets less than \$50,000, annual income shall include the actual income from those assets.</li> <li>• If the family has net family assets in excess of \$50,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate.</li> <li>• The full amount of periodic payments received from...</li> </ul> <p>The annual income will be calculated for the family head of household and the spouse...</p>	6-2 to 6-3	<p>Updated to include new HUD approved policies:</p> <p>...Annual income includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• The <del>full</del> <i>gross</i> amount, before any payroll deductions...</li> <li>• ...</li> <li>• ...</li> <li>• If the <i>market value of a family's has-net family combined assets is</i> less than \$50,000, annual income shall <del>include the actual income from those assets be excluded from income calculations.</del></li> <li>• If the <i>market value of a family's has-net family combined assets is</i> in excess of \$50,000, annual income shall include <del>the greater of the actual income derived from all net family assets or a</del> percentage of the <i>market/face</i> value of such assets, based on the current <i>established</i> passbook savings rate. <i>For example, if the family's combined market value of their assets is \$75,000 and the passbook savings rate is 1%, the imputed income from assets is \$750.</i></li> <li>• The <del>full</del> <i>gross</i> amount of periodic payments received from...</li> </ul> <p>The annual income will be calculated for the family head of household and the spouse... <i>Income from adult full-time students will be excluded from calculations of household TTP.</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 6: FACTORS RELATED TO TOTAL TENANT PAYMENT (TTP) AND FAMILY SHARE DETERMINATION (Continued)

<p><b><u>6.4 INCOME AND ALLOWANCES</u></b></p> <p><b>6.4.1 Annual Income</b></p> <p>...Annual income excludes the following:</p> <ul style="list-style-type: none"> <li>• Income from the employment of emancipated...</li> <li>• ...</li> <li>• Continued Participation only: amounts received under HABC-approved economic self-sufficiency programs, including stipends...</li> <li>• ...</li> </ul>	6-3 to 6-4	<p>Updated to include limitations on types of stipends excluded, and new HUD approved policies:</p> <p>...Annual income excludes the following:</p> <ul style="list-style-type: none"> <li>• Income from the employment of emancipated...</li> <li>• ...</li> <li>• Continued Participation only: amounts received under HABC-approved economic self-sufficiency programs, including stipends <i>received by Federal, State or local agencies...</i></li> <li>• ...</li> </ul>
<p><b><u>6.4 INCOME AND ALLOWANCES</u></b></p> <p><b>6.4.2 Adjusted Income</b></p> <p>Adjusted income...after making the following deductions:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• Allowable medical expenses: The sum of the following (to the extent that the sum exceeds 3% of annual income): <ul style="list-style-type: none"> <li>◦ Unreimbursed medical expenses of any elderly or disabled family...</li> </ul> </li> <li>• Child care expense: <ul style="list-style-type: none"> <li>◦ Deducted for the care of children under 13...</li> </ul> </li> <li>• ...</li> </ul>	6-4 to 6-5	<p>Clarifying language added:</p> <p>Adjusted income...after making the following deductions:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• Allowable medical expenses: The sum of the following (to the extent that the sum exceeds 3% of <del>annual</del> <i>total household gross</i> income): <ul style="list-style-type: none"> <li>◦ Unreimbursed medical expenses of any elderly or disabled family (<i>i.e. the head, co-head, or spouse is elderly or disabled</i>)...</li> </ul> </li> <li>• Child care expense: <ul style="list-style-type: none"> <li>◦ Deducted for the care of children under 13...</li> <li>◦ <i>Deducted for dependents who are disabled and require care that is necessary, reasonable and customary to allow an adult member to work, attend school, or actively seek employment.</i></li> </ul> </li> <li>• ...</li> </ul>
<p><b><u>6.5 EARNED INCOME DISREGARD (EID) FOR PERSONS WITH DISABILITIES</u></b></p> <p>The annual income for qualified disabled families will not be excluded if the result of increases in the earned income of a family member who is a person with disabilities and otherwise qualifies for the EID. A full exclusion of the earned income begins on the date of the increase in earned income and continues for a cumulative twelve (12) month period. After the disabled family receives 12 calendar months of the full exclusion, annual income will exclude half the increase in earned income for an additional 12 calendar months.</p>	6-5 to 6-6	<p>Revised to match EID language:</p> <p><i>HUD's Earned Income Disregard (EID) applies to voucher families that include a person or persons with disabilities, and affords them the ability to accept a job without having their rent increase immediately as a result of the earned income. For the first year (cumulative 12 calendar months) of employment, HABC will disregard 100% of the earned income. In the second year (cumulative 13-24 months) of employment, only 50% of the earned income will be counted towards calculating rent portions. <del>The annual income for qualified disabled families will not be excluded if the result of increases in the earned income of a family member who is a person with disabilities and otherwise qualifies for the EID. A full exclusion of the earned income begins on the date of the increase in earned income and continues for a cumulative twelve (12) month period. After the disabled family receives 12 calendar months of the full exclusion, annual income will exclude half the increase in earned income for an additional 12 calendar months.</del></i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 6: FACTORS RELATED TO TOTAL TENANT PAYMENT (TTP) AND FAMILY SHARE DETERMINATION (Continued)

<p><b><u>6.5 EARNED INCOME DISREGARD (EID) FOR PERSONS WITH DISABILITIES</u></b></p> <p><b>6.5.4 Maximum Two Year Disregard</b></p> <p>The earned income disregard is limited to a lifetime 24-month period for each family member who is a person with disabilities. For each family member who is a person with disabilities, the disregard only applies for a maximum of 12 months of full exclusion of incremental increase, and a maximum of 12 months of phase-in exclusion during the 24-month period starting from the date of the initial exclusion.</p> <p>If the period of increased income does not last for 12 consecutive months...</p>	6-6	<p>Revised to match EID language:</p> <p>The earned income disregard is limited to a lifetime 24-month period for each family member who is a person with disabilities, <i>and the calendar begins on the date of employment</i>. For each family member who is a person with disabilities, the disregard only applies for a maximum of 12 months of <del>full 100% (full)</del> exclusion of <del>incremental increase earned income</del>, and a maximum of 12 months of <del>phase-in 50% (phase-in)</del> exclusion during the 24-month period starting from the date of <del>the initial exclusion employment</del>.</p> <p>If the period of <del>increased</del> <i>earned</i> income does not last for 12 consecutive months...</p>
<p><b><u>6.6 DEFINITION OF TEMPORARILY/PERMANENTLY ABSENT</u></b></p> <p><b>6.6.2 Reporting Additions to Owner and HABC</b></p> <p>Reasons to approve additional household members include, but are not limited to:</p> <ul style="list-style-type: none"> <li>...</li> <li>...</li> <li>Significant others can be added to the voucher upon approval by the landlord and by the Deputy Chief...</li> </ul> <p>Reasons to deny additional household members include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Previously removed, non-disabled adults will not be re-added to the voucher.</li> </ul> <p>Adults with children will be considered separate families bypassing the waiting list, and will not be added to the voucher...</p>	6-8 to 6-9	<p>Updating and removing repetitive and misleading language:</p> <p>Reasons to approve additional household members include, but are not limited to:</p> <ul style="list-style-type: none"> <li>...</li> <li>...</li> <li><i>New members, including</i> significant others can be added to the voucher upon approval by the landlord and by the Deputy Chief...</li> <li><i>Exceptions may be made to the above circumstances, upon approval by the landlord and Deputy Chief for HCVP, or designee.</i></li> </ul> <p><del>Reasons to deny additional household members include, but are not limited to:</del></p> <ul style="list-style-type: none"> <li><del>Previously removed, non-disabled adults will not be re-added to the voucher.</del></li> </ul> <p><i>Other adults with children who are not a part of the voucher household, or who are not a significant other to any household member, will be considered separate families bypassing the waiting list, and will not be added to the voucher...</i></p>
<p><b><u>6.13 CHILD CARE EXPENSES</u></b></p> <p>...Child care expenses cannot be allowed as a deduction if there is an adult household member capable of caring for the child who can provide the child care...</p>	6-11	<p>Adding statement regarding what is not considered a child care expense:</p> <p>...Child care expenses <i>are not for educational or recreational care (i.e. summer camps, recreational sports such as football, soccer, etc., etc.) for children under 13 and</i> cannot be allowed as a deduction if there is an adult household member capable of caring for the child who can provide the child care...</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 6: FACTORS RELATED TO TOTAL TENANT PAYMENT (TTP) AND FAMILY SHARE DETERMINATION (Continued)

<p><b><u>6.17 UTILITY ALLOWANCE AND UTILITY ALLOWANCE PAYMENTS</u></b></p> <p>...The approved utility allowance schedule is given to families along with their Voucher. The utility allowance is based on the lesser of the actual unit size selected or the family's voucher size; where the rent calculation results in a utility allowance payment (UAP) due the family, HABC will provide a UAP for the family each month. The check will be made out directly to the participant.</p>	6-13	<p>Updating language to match current policy and practice:</p> <p>...The approved utility allowance schedule is given to families along with their Voucher. The utility allowance is based on the lesser of the actual unit size selected or the family's voucher size; <del>where the Rent calculations may results</del> in a utility allowance payment (UAP) due to the family, <del>HABC will provide a UAP for the family which are paid directly to the family, electronically on a debit card</del> each month. <del>The check will be made out directly to the participant.</del></p>
<p><b>6.17.1 Water Conservation Efforts Affecting Utility Allowances</b></p> <p>REMOVING SECTION – ACTIVITY CLOSED OUT</p>	6-14	<p>Removing section as activity was closed out.</p> <p><del>HABC will be implementing energy conservation activities to reduce the cost of water/sewage utility allowances by approximately 35%. Low flow toilets will be encouraged and provided by HABC for landlords/owners that wish to participate.</del></p> <p><del>There will be an initial capital expenditure of approximately \$400 per fixture, which will be reimbursed to the landlords/owners for the installation costs. An estimated comparable lump sum payment will be made to the landlords. Additionally, non federal funds will be provided for water conservation installations. Third party verification will be obtained for water consumption reduction and utility allowance payments (UAPs) will be adjusted accordingly. Cost saving will commence upon implementation once reimbursement to the landlord's capital expenditures are complete and UAPs adjusted. The UAP will not be adjusted until installation is complete and verified.</del></p>

## Chapter 7: VERIFICATION PROCEDURES

<p><b><u>7.1 INTRODUCTION</u></b></p> <p>Eligibility and Total Tenant Payment/Family Share will be verified by the HABC. HABC staff will obtain written verification from independent sources whenever possible and will document participant files whenever third party verifications are not possible and the file entry will explain the reasons for not obtaining the third party verification.</p> <p>Applicants and program participants must provide true and complete information to the HABC whenever information is requested. The HABC verification requirements are designed to maintain program integrity.</p> <p>This Chapter explains the HABC procedures and standards for verification of preferences, income, assets, allowable deductions, family status, and changes in family composition. The HABC will obtain proper authorization from the family before requesting information from independent sources.</p>	7-1	<p>Update language to match current policy and make the section more understandable to clients:</p> <p>Eligibility and Total Tenant Payment/Family Share will be verified by <del>the</del> HABC. <del>HABC staff will obtain written verification from independent sources whenever possible and will document participant files whenever third party verifications are not possible and the file entry will explain the reasons for not obtaining the third party verification.</del></p> <p>Applicants and program participants must provide true and complete information to <del>the</del> HABC <del>whenever information is</del> when requested. <u>HABC staff will obtain written verification from independent sources whenever possible and will document participant files whenever third party verifications are not possible and the file entry will explain the reasons for not obtaining the third party verification.</u> The HABC verification requirements are designed to maintain program integrity.</p> <p>This Chapter explains <del>the</del> HABC procedures and standards for verification of <i>identity, criminal history, familial status, family composition, full-time student status, disability status, citizenship status,</i> preferences, income, assets, <del>allowable deductions, family status, and changes in family composition</del> allowable deductions. <del>The</del> HABC will obtain proper authorization from the family before requesting information from independent sources.</p>
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FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 7: VERIFICATION PROCEDURES (Continued)

<p><b><u>7.3 METHODS OF VERIFICATION AND TIME ALLOWED</u></b></p> <p>HABC will verify information through the five methods of verification acceptable to HUD in the following order:</p> <ul style="list-style-type: none"> <li>• UIV thru EIV</li> <li>• UIV thru non-HUD system</li> <li>• Written 3<sup>rd</sup> Party Verification</li> <li>• Written 3<sup>rd</sup> Party Verification Form</li> <li>• Oral 3<sup>rd</sup> Party Verification</li> <li>• Tenant Declaration</li> </ul>	7-1	<p>Adding priority levels to each method of verification hierarchy:</p> <p><b><u>7.3 METHODS OF <i>INCOME</i> VERIFICATION AND TIME ALLOWED</u></b></p> <p>HABC will verify <i>income</i> information through the five methods of verification acceptable to HUD in the following order:</p> <ul style="list-style-type: none"> <li>• <i>Level 6 (highest):</i> UIV thru EIV</li> <li>• <i>Level 5:</i> UIV thru non-HUD <i>verification</i> system (<i>i.e. The Work Number</i>)</li> <li>• <i>Level 4:</i> Written 3<sup>rd</sup> Party Verification (<i>i.e. paystubs, payroll summary reports, benefit letters, etc.</i>)</li> <li>• <i>Level 3:</i> Written 3<sup>rd</sup> Party Verification Form (<i>i.e. Wage Form</i>)</li> <li>• <i>Level 2:</i> Oral 3<sup>rd</sup> Party Verification (<i>i.e. in-person or via telephone</i>)</li> <li>• <i>Level 1:</i> Tenant Declaration (<i>i.e. notarized or certified self-declaration</i>)</li> </ul>
<p><b><u>7.3 METHODS OF VERIFICATION AND TIME ALLOWED</u></b></p> <p><b>7.3.2 Written Third-Party Verification</b></p> <p>HABC will accept verifications in the form of recent computerized printouts delivered by the family from the following agencies:</p> <ul style="list-style-type: none"> <li>• Social Security Administration - upfront verification is available through matching for program participants only</li> <li>• Veterans Administration</li> <li>• Social Services</li> <li>• Unemployment Compensation Board</li> <li>• Bureau of Child Support Enforcement</li> <li>• City or County Courts</li> </ul>	7-2	<p>Adding priority levels to each method of verification hierarchy:</p> <p><b><u>7.3 METHODS OF <i>INCOME</i> VERIFICATION AND TIME ALLOWED</u></b></p> <p><b>7.3.2 Written Third-Party Verification (<i>Level 4/3</i>)</b></p> <p>HABC will accept verifications in the form of recent computerized printouts delivered by the family from the following agencies:</p> <ul style="list-style-type: none"> <li>• Social Security Administration - upfront verification is available through matching for program participants only</li> <li>• Veterans Administration</li> <li>• Social Services</li> <li>• Unemployment Compensation Board</li> <li>• Bureau of Child Support Enforcement</li> <li>• City or County Courts</li> <li>• <i>Banks (bank statements)</i></li> <li>• <i>Third-party verification forms (level 3) from any of the agencies listed above.</i></li> </ul>
<p><b><u>7.3 METHODS OF VERIFICATION AND TIME ALLOWED</u></b></p> <p><b>7.3.3 Third-Party Oral Verification</b></p> <p>Oral third-party verification will be used...staff will be required to document the following:</p> <ul style="list-style-type: none"> <li>• With whom they spoke</li> <li>• The date of the conversation</li> <li>• The facts provided</li> </ul>	7-3	<p>Adding priority levels to each method of verification hierarchy:</p> <p><b><u>7.3 METHODS OF <i>INCOME</i> VERIFICATION AND TIME ALLOWED</u></b></p> <p><b>7.3.3 <i>Oral</i> Third-Party <del>Oral</del> Verification (<i>Level 2</i>)</b></p> <p>Oral third-party verification will be used...staff will be required to document the following:</p> <ul style="list-style-type: none"> <li>• With whom they spoke</li> <li>• The date of the conversation</li> <li>• <i>The phone number used to have the conversation (including any extensions); and</i></li> <li>• The facts provided.</li> </ul>
<p><b><u>7.3 METHODS OF VERIFICATION AND TIME ALLOWED</u></b></p> <p><b>7.3.4 Review of Documents and</b></p> <p><b>7.3.5 Self-Certification/Self-Declaration</b></p>	7-3	<p>Moved section – was after “Review of Documents” and out of an organizational manner. Moved to <b>Section 7.3.4</b> to come as the last verification method, matching its status in the hierarchy.</p> <p>Making Review of Documents its own section – <b>7.4 REVIEW OF DOUCMENTS, thereby updating ITEMS TO BE VERIFIED to Section 7.5</b></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 7: VERIFICATION PROCEDURES (Continued)

<p><b><u>7.5 VERIFYING NON-FINANCIAL FACTORS</u></b></p> <p><b>7.5.9 Verification of Citizenship/Eligible Immigrant Status</b></p> <p><b><i>7.5.9.3 Acceptable Documents of Eligible Immigration</i></b></p> <p>A birth certificate is not acceptable verification of status. The regulations stipulate that only the following documents are acceptable unless changes are published in the Federal Register:</p> <ul style="list-style-type: none"> <li>• Resident Alien Card (I-551)</li> <li>• Alien Registration Receipt Card (I-151)</li> <li>• Arrival-Departure Record (I-94)</li> <li>• Temporary Resident Card (I-688)</li> <li>• Employment Authorization Card (I-688B)</li> </ul>	7-8	<p><i>Section # updated to 7.6</i></p> <p>Updating acceptable immigration documents as per current Federal Register notices:</p> <p>A birth certificate is not acceptable verification of <i>immigration</i> status. The regulations stipulate that only the following documents are acceptable unless changes are published in the Federal Register:</p> <ul style="list-style-type: none"> <li>• Resident Alien Card (I-551 <i>or I-151</i>)</li> <li>• <del>Alien Registration Receipt Card (I-151)</del></li> <li>• <i>Memorandum of Creation of Record of Lawful Permanent Residence (I-181) with approval stamp</i></li> <li>• <i>Permit to Re-enter the United States (I-327)</i></li> <li>• <i>Refugee Travel Document (I-571)</i></li> <li>• Arrival-Departure Record (I-94)</li> <li>• Temporary Resident Card (I-688)</li> <li>• Employment Authorization Card (I-688B)</li> <li>• <i>Employment Authorization Document (I-766)</i></li> </ul>
<p><b><u>7.5 VERIFYING NON-FINANCIAL FACTORS</u></b></p> <p><b>7.5.11 Verification for a Medical Need for Larger Unit</b></p> <p>A written certification that a larger unit is necessary must be obtained from a licensed medical professional.</p> <p>A healthcare provider or professional may be a nurse...or case worker.</p>	7-9	<p><i>Section # updated to 7.6</i></p> <p>Updating language to cover all acceptable forms of medical professionals:</p> <p>A written certification that a larger unit is necessary must be obtained from a <del>licensed medical</del> <i>healthcare provider or</i> professional.</p> <p>A healthcare provider or professional may be a nurse...or case worker <i>who is in a position to know the disability and who can explain how the requested accommodation will assist with the disability.</i></p>
<p><b><u>7.6 VERIFICATION OF WAITING LIST PREFERENCES</u></b></p> <p><b>7.6.3 Residency Preference</b></p> <p>This preference is for families who live in the jurisdiction of HABC. To verify that an applicant is a resident, HABC will require in the following order:</p> <ul style="list-style-type: none"> <li>• An executed lease and rent receipts.</li> <li>• Government agency records and utility bills in the name of the head of household or spouse.</li> <li>• Current driver's license or voters registration card and utility bills in the name of the head of household or spouse.</li> </ul>	7-9	<p><i>Section # updated to 7.7</i></p> <p>Updating list to match current policy and removing repetitive language:</p> <p>This preference is for families who live in the jurisdiction of HABC. To verify that an applicant is a resident, HABC will require <del>in the following order one or more of the following items:</del></p> <ul style="list-style-type: none"> <li>• An executed lease and rent receipts.</li> <li>• Government agency records.</li> <li>• <del>and</del> Utility <del>bills statement</del> in the name of the head of household or spouse.</li> <li>• Current driver's license or voter's registration card <del>and utility bills in the name of the head of household or spouse.</del></li> </ul>
<p><b><u>7.7 VERIFICATION OF INCOME</u></b></p> <p><b>7.7.9 Zero Income Status</b></p> <p>Any member of the family claiming to have no income...This level of verification will be done at every re-examination if claiming zero income status.</p> <p>HABC will run a credit report if information is received that indicates the family member has an unreported income source.</p>	7-12	<p><i>Section # updated to 7.8</i></p> <p>Removing outdated language/policy:</p> <p><b><u>7.8 VERIFICATION <i>S BY TYPES</i> OF INCOME</u></b></p> <p>Any member of the family claiming to have no income...This level of verification will be done at every re-examination if claiming zero income status.</p> <p><del>HABC will run a credit report if information is received that indicates the family member has an unreported income source.</del></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 7: VERIFICATION PROCEDURES (Continued)

<p><b><u>7.9 VERIFICATION OF ASSETS</u></b></p> <p><b>7.9.1 Family Assets</b></p> <p>HABC will require the information necessary to determine the current cash value of the family's assets (the net amount the family would receive if the asset were converted to cash). Anything under \$50,000 is verified through self-declaration...</p>	7-13 to 7-14	<p>Section # updated to <b>7.10</b></p> <p>Adding / Updating section as per HUD approved plan with assets less than \$50,000:</p> <p><b>7.10.1 Assets Worth Less than \$50,000</b></p> <p><i>Under the authority of the MTW Agreement, applicants and participants will be allowed to self-certify asset value and income when the market value of the family's combined assets is \$50,000 or below. When the market value of the asset is greater than \$50,000, HABC will verify the market value of the asset using the verification hierarchy. Each household will be required to complete one asset self-certification at admission and at each regular recertification.</i></p> <p>HABC will require the information necessary to determine the current <del>cash market</del> value of the family's <i>combined</i> assets <del>(the net amount the family would receive if the asset were converted to cash)</del>...</p>
<p><b><u>7.9 VERIFICATION OF ASSETS</u></b></p> <p><b>7.9.2 Assets over \$50,000 Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Re-examination</b></p> <p>For all Certifications and Re-examinations, HABC will obtain the family's self-certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or reexamination.</p> <p>If the family self-certifies that they have disposed of assets for less than fair market value, verification is required that shows: (a) all assets disposed of for less than FMV, (b) the date they were disposed of, (c) the amount the family received, and (d) the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.</p>	7-14	<p>Section # updated to <b>7.10</b></p> <p>Adding / Updating section as per HUD approved plan with assets less than \$50,000:</p> <p><b>7.10.2 Assets over \$50,000 ...</b></p> <p><i>For assets disposed at less than fair market value in the two years preceding the effective date of admission or the certification, HABC will accept a self-certification from the household including a certification regarding the assets disposed, the date of disposition and the amount received for the asset. <del>For all Certifications and Re-examinations, HABC will obtain the family's self-certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or reexamination.</del></i></p> <p><del>If the family self-certifies that they have disposed of assets for less than fair market value, verification is required that shows: (a) all assets disposed of for less than FMV, (b) the date they were disposed of, (c) the amount the family received, and (d) the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.</del></p>

## Chapter 8: VOUCHER ISSUANCE AND BRIEFINGS

<p><b><u>8.1 INTRODUCTION</u></b></p> <p>HABC goals and objectives are designed to ensure that families selected to participate in the Housing Choice Voucher Program are equipped with the tools necessary to locate an acceptable housing unit...</p>	8-1	<p>Adding statement at end of section to provide introduction relating to quality housing and owner outreach:</p> <p>...</p> <p><i>In this Chapter, HABC will discuss how it conducts Owner Outreach and the efforts involved in educating owners on the program and owner responsibilities.</i></p>
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FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 8: VOUCHER ISSUANCE AND BRIEFINGS (Continued)

<p><b><u>8.2 ISSUANCE OF VOUCHERS</u></b></p> <p>... HABC will conduct individual briefings for families with disabilities at their homes, upon request by the family, if required for reasonable accommodation. HABC will allow a representative of the family (i.e., live-in aide, family member, or case manager) to attend the briefing on behalf of the family, as a reasonable accommodation for a disability that prevents the family from attending.</p>	8-1	<p>Adding statement regarding the requirement of approval that is needed in order for representatives of a family to attend a briefing on the voucher holders' behalf:</p> <p>... HABC <del>will</del> <i>may</i> allow a representative of the family (i.e., live-in aide, family member, or case manager) to attend the briefing on behalf of the family, as a reasonable accommodation for a disability that prevents the family from attending, <i>upon approval of a written request (see Chapter 1, Section 1.10 Reasonable Accommodations).</i></p>
<p><b><u>8.3 BRIEFING TYPES AND REQUIRED ATTENDANCE</u></b></p> <p><b>8.3.1 Voucher Briefings</b></p> <p>...A full briefing will be conducted for families who are determined to be eligible for assistance. Group briefings will be conducted. Families who attend group briefings and still have the need for individual assistance, will be referred to the appropriate program specialist....</p> <p>...HABC will use the voucher briefing to explain the documents included in the voucher information packet, and to discuss relevant issues including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• A general description of the Housing Choice Voucher program.</li> <li>• ...</li> <li>• Where a household may lease a unit, including renting a unit outside HABC's jurisdiction.</li> <li>• Explanation of Portability.</li> <li>• Advantages of moving to a census tract of low poverty concentration.</li> <li>• ...</li> <li>• Exercising choice in residency.</li> <li>• ...</li> <li>• Maintenance of a "Search" log.</li> <li>• VAWA Notice and Information Packet</li> </ul>	8-2 to 8-3	<p>Adding statement regarding individual briefings:</p> <p>...A full briefing will be conducted for families who are determined to be eligible for assistance. Group <i>voucher</i> briefings will be conducted...<i>Individual briefings may be conducted under specific conditions for certain programs, or as a reasonable accommodation for persons with disabilities upon request and with approval by the Deputy Chief for HCVP or designee.</i></p> <p>Updating list of information provided during voucher briefings and removing repetitive language:</p> <p>...HABC will use the voucher briefing to explain the documents included in the voucher <del>information briefing</del> packet, and to discuss relevant issues including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• A general description of the Housing Choice Voucher program.</li> <li>• ...</li> <li>• Where a household may lease a unit, including renting a unit outside HABC's jurisdiction (<i>portability</i>).</li> <li>• <del>Explanation of Portability.</del></li> <li>• Advantages of moving to a census tract of low poverty concentration.</li> <li>• ...</li> <li>• <del>Exercising choice in residency.</del></li> <li>• ...</li> <li>• Maintenance of a "Search" log.</li> <li>• <i>Fair Housing Policies and Discrimination Form.</i></li> <li>• VAWA Notice and Information Packet</li> </ul>
<p><b><u>8.8 RETENTION OF VOUCHER – REMAINING MEMBER OF PARTICIPANT FAMILY</u></b></p> <p>Persons that have been previously approved as family members can be considered the remaining member of the participant family. A live-in attendant, by definition, is not a member of the family...</p>	8-7 to 8-8	<p>Revising statement to reflect current policy:</p> <p>Persons that <del>have been previously approved are a part of the household at the time of review as family members can</del> <i>may</i> be considered <del>the</del> remaining members of the participant family. A live-in <del>attendant aide</del>, by definition, is not a member of the family...</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 9: REQUEST FOR TENANCY APPROVAL AND CONTRACT EXECUTION

<p><b><u>9.2 REQUEST FOR TENANCY APPROVAL</u></b></p> <p>...HABC will not permit the family to submit more than one RFTA at a time...</p>	9-1	<p>Adding statement pertaining to landlord completion of RFTAs:</p> <p>...HABC will not permit the family to submit more than one RFTA at a time, <i>nor will HABC permit a landlord to complete more than one RFTA per unit at a time...</i></p>
<p><b><u>9.4 LEASE REVIEW</u></b></p> <p>...The lease must specify the:</p> <ul style="list-style-type: none"> <li>Names and contact information of the owner and tenant.</li> <li>...</li> <li>Amount of the monthly rent to owner.</li> <li>Utilities and appliances to be supplied by the owner.</li> <li>Utilities and appliances to be supplied by the family.</li> </ul>	9-4	<p>Adding additional requirements as per the Leasing and Contracting Manager:</p> <p>...The lease must specify <i>and include</i> the <i>following</i>:</p> <ul style="list-style-type: none"> <li>Names <del>and contact information</del> of the owner, <i>landlord and/or the Property Management Company</i> and <i>names of the tenant and of all occupants of the assisted unit</i>.</li> <li>...</li> <li>Amount of the <del>monthly total contract rent to owner</del>.</li> <li><i>Move-in date and the start and end dates of the lease term.</i></li> <li>Utilities and appliances <del>to be supplied by that are</del> the owner's <i>responsibility</i>.</li> <li>Utilities and appliances <del>to be supplied by that are</del> the family's <i>responsibility</i>.</li> <li><i>No additional fees outside of lease terms.</i></li> <li><i>Dated signatures.</i></li> <li><i>Lead disclosure (if applicable).</i></li> </ul>
<p><b><u>9.4 LEASE REVIEW</u></b></p> <p><b>9.4.1 Actions before Lease Term</b></p> <p>All of the following must be completed before the beginning of the initial term of the lease for a unit:</p> <ul style="list-style-type: none"> <li>HABC must inspect the unit and has determined that the unit satisfies the housing quality standards.</li> <li>...</li> <li>Owner must provide the following required documentation prior to lease signing: <ul style="list-style-type: none"> <li>MDE Lead Certification</li> <li>Property Registration</li> <li>MFD Registration</li> <li>Use &amp; Occupancy Certificate</li> <li>Proof that the water bill is paid in full</li> <li>Management/Agent Agreement</li> </ul> </li> </ul>	9-4	<p>Adding additional requirements and referencing HAP Contract wherever lease terms are mentioned:</p> <p><b>9.4.1 Actions before Lease Term <i>and Execution of the Housing Assistance Payment (HAP) Contract</i></b></p> <p>All of the following must be completed before the beginning of the initial term of the lease for a unit <i>and prior to execution of the HAP Contract</i>:</p> <ul style="list-style-type: none"> <li>HABC must inspect the unit and has determined that the unit satisfies the housing quality standards.</li> <li>...</li> <li>Owner must provide the following required documentation prior to lease signing: <ul style="list-style-type: none"> <li>MDE Lead Certification</li> <li><i>Government issued Photo ID (a clear copy) for the owner and for the person signing on behalf of the owner</i></li> <li>Property Registration (<i>receipts are no longer accepted</i>)</li> <li>MFD Registration (<i>if applicable</i>)</li> <li><i>Articles of Organization and Operating Agreement (if applicable)</i></li> <li><i>Tax Identification Number on IRS letterhead or other tax documents</i></li> <li><i>W-9 tax forms</i></li> <li><i>Direct Deposit form</i></li> <li>Use &amp; Occupancy Certificate</li> <li>Proof that the water bill is paid in full</li> <li>Management/Agent Agreement</li> </ul> </li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 9: REQUEST FOR TENANCY APPROVAL AND CONTRACT EXECUTION (Continued)

<b><u>9.12 CONTRACT EXECUTION PROCESS</u></b>  ...The following HABC representative(s) is/are authorized to execute a contract on behalf of the HABC: <ul style="list-style-type: none"> <li>Leasing Manager</li> <li>Program Administrator</li> <li>Deputy Chief or designee</li> </ul>	9-7	Removing this statement, as all persons signing a contract are signing on behalf of the Deputy Chief and no one else.  <del>The following HABC representative(s) is/are authorized to execute a contract on behalf of the HABC:</del> <ul style="list-style-type: none"> <li><del>Leasing Manager</del></li> <li><del>Program Administrator</del></li> <li><del>Deputy Chief or designee</del></li> </ul>
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## Chapter 10: HOUSING QUALITY STANDARDS AND INSPECTIONS

<b><u>10.1 INTRODUCTION</u></b>  ...HABC will normally schedule inspections on business days between the hours of 9:00AM and 5:00pm... Inspection standards are ensured through Quality Control inspections conducted by the HCVP...within ten (10) working days of the previously completed inspection...	10-1	Updating timeframe to reflect accurate frequency:  ...HABC will normally schedule inspections on business days between the hours of 9:00AM and 5:45:00pm...  ... or <i>other</i> designated person within <del>ten (10) working</del> <i>forty-five (45) calendar</i> days of the previously completed inspection...
<b><u>10.2 GUIDELINES/TYPES OF INSPECTIONS</u></b>  <b>10.2.1 Walls</b>  ...Any exterior or interior surfaces with peeling or chipping paint must be scraped and painted with two coats of unleaded paint or other suitable material...  <b>10.2.9 Modifications</b>  ...There are 7 types of inspections HABC will perform: <ul style="list-style-type: none"> <li><u>Pre-Contract</u>: Conducted upon receipt of Request for Tenancy Approval.</li> <li><u>Annual</u>: Must be conducted once a year and is scheduled on an annual basis. <i>*Self-Certification is available (see Self-Certification at Chapter 10, Section 10.4.2)</i></li> <li><u>Risk Based</u>: Must be conducted within two years of the last passed annual inspection; not available on units under pre-contract / initial inspection status. <i>*Self-Certification is available (see Self-Certification at Chapter 10, Section 10.4.2)</i></li> <li><u>Follow-Up</u>: Follow-up for failed, incomplete or an unable-to-conduct inspections; not required on self-certified items.</li> <li><u>Special/Complaint</u>: At request of owner, family or an agency or third-party.</li> <li><u>Move-out/Vacate</u>: At the request of the landlord to document tenant damages.</li> <li><u>Quality Control</u>: Concurrent or within ten (10) working days of the scheduled inspection.</li> </ul>	10-1  and  10-3	Updating language to reflect current requirements of HABC:  <b>10.2.1 Walls</b>  ...Any exterior or interior surfaces with peeling or chipping paint must be scraped <i>to remove the deterioration</i> and <i>repainted</i> with two coats of unleaded paint or other suitable material...  Making Types of Inspections its own section: <b><i>10.2.10 Types of Inspections</i></b>  ...There are 7 types of inspections HABC will perform: <ul style="list-style-type: none"> <li><u>Pre-Contract</u>: Conducted upon receipt of Request for Tenancy Approval.</li> <li><u>Annual</u>: Must be conducted once a year and is scheduled on an annual basis. <i>*Self-Certification is available (see Self-Certification at Chapter 10, Section 10.4.2)</i></li> <li><u>Risk Based</u>: Must be conducted within two years of the last passed annual inspection; not available on units under pre-contract / initial inspection status. <i>*Self-Certification is available (see Self-Certification at Chapter 10, Section 10.4.2)</i></li> <li><u>Follow-Up or Re-Inspection</u>: Follow-up for failed, incomplete or an unable-to-conduct inspections; not required on self-certified items.</li> <li><u>Special/Complaint</u>: At request of owner, family or an agency or third-party.</li> <li><u>Move-out/Vacate</u>: At the request of the landlord to document tenant damages.</li> <li><u>Quality Control</u>: Concurrent or within <del>ten (10) working</del> <i>forty-five (45) calendar</i> days of the scheduled inspection.</li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 10: HOUSING QUALITY STANDARDS AND INSPECTIONS (Continued)

<p><b><u>10.3 PRE-CONTRACT (INITIAL) HQS INSPECTION</u></b></p> <p><b>10.3.1 Timely Pre-Contract (Initial) HQS Inspection</b></p> <p>...HABC may agree to further follow-up inspections and may impose fees upon owners for these additional inspections...</p>	10-4 to 10-5	<p>Updating statement to reflect when HABC may charge for re-inspections</p> <p>...HABC may agree to further follow-up inspections and may impose fees upon owners for these additional inspections. <i>If an initial pre-contract inspection is scheduled for a unit, and that unit is not ready by the time a HCVP Inspector arrives, HABC may charge for any follow-up inspection on that same unit. Owners are encouraged to have their units ready for inspection by the date they specify on the RFTA...</i></p>
<p><b><u>10.4 SCHEDULED INSPECTIONS</u></b></p> <p><b>10.4.1 Risk-Based Inspections</b></p> <p>...HABC will attempt to inspect all units under contract in accordance with its housing quality standards at least once every two (2) years...</p>	10-6	<p>Update language to further identify and provide example of Risk Based Inspections:</p> <p>...HABC will attempt to inspect all units under contract in accordance with its housing quality standards <del>at least once every two (2) years.</del> <i>Upon completion of an inspection, HABC will determine whether the unit passes or fails. If the unit passes the annual inspection on the first attempt, the Risk-Based inspection process states that HABC can skip a year for the next annual inspection. Example: If a unit already under contract is inspected on May 1, 2019 and passes on the first attempt, under the Risk-Based inspection process the next annual inspection may not be scheduled until May 1, 2021 (unless requested or at HABC's discretion)...</i></p>
<p><b><u>10.4 SCHEDULED INSPECTIONS</u></b></p> <p><b>10.4.2 Self-Certification for Owners</b></p> <p>...The HQS Owner Self-Certification Form must be submitted to HABC and can be downloaded through the Landlord Partner Portal or by visiting HABC's website:</p> <ul style="list-style-type: none"> <li>Visit <a href="http://www.baltimorehousing.org">www.baltimorehousing.org</a>;</li> <li>Click on the HCVP Quick Link, Frequently Requested Policies and Forms</li> <li>Click on number two (2) for the Self-Certification HQS Inspection Form.</li> </ul>	10-6	<p>Updating instructions for obtaining self-certification form on HABC's new website:</p> <p>...The HQS Owner Self-Certification Form must be submitted to HABC and can be downloaded through the Landlord Partner Portal or by visiting HABC's website:</p> <ul style="list-style-type: none"> <li>Visit <a href="http://www.baltimorehousing.org">www.baltimorehousing.org</a>;</li> <li>Click on the HCVP <del>Quick</del> Link <i>at the top of the page;</i></li> <li><i>Scroll down to the bottom and click the Landlords link;</i></li> <li><i>Click the Relevant Forms link at the bottom;</i></li> <li><del>Frequently Requested Policies and Forms</del></li> <li>Click on <del>number two (2)</del> <i>the second link listed,</i> for the Self-Certification HQS Inspection Form.</li> </ul>
<p><b><u>10.4 SCHEDULED INSPECTIONS</u></b></p> <p><b>10.4.4 Inspection Outcomes</b></p> <p>... If, at the time of the inspection, the unit fails to meet HABC's housing quality standards, the owner and voucher holder will be notified of the reasons for the failure. The owner is responsible to correct all deficiencies which cause a unit to fail unless it is a fail for which the voucher holder is responsible. The voucher holder shall be required to correct deficiencies determined to be within the tenant's responsibility (see Family Obligations in Chapter 15, Section 15.5)...</p>	10-7	<p>Adding statement that HABC reserves the right to issue vouchers to move if the unit is discovered with recurring violations that result from improperly curing previous citations:</p> <p>... If, at the time of the inspection, the unit fails to meet HABC's housing quality standards, the owner and voucher holder will be notified of the reasons for the failure. The owner is responsible to correct all deficiencies which cause a unit to fail unless it is a fail for which the voucher holder is responsible. The voucher holder shall be required to correct deficiencies determined to be within the tenant's responsibility (see Family Obligations in Chapter 15, Section 15.5). <i>HABC reserves the right to issue participants a HQS voucher upon discovery of re-occurring violations affecting the health and safety of the family living in the unit.</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 10: HOUSING QUALITY STANDARDS AND INSPECTIONS (Continued)

<p><b><u>10.7 QUALITY CONTROL INSPECTIONS</u></b></p> <p>... The sample files will include recently completed inspections (i.e., within ten (10) business days), a cross-section of neighborhoods, and a cross-section of inspectors.</p>	10-9	<p>Updating actual timeframes for QC inspections to be conducted:</p> <p>... The sample files will include recently completed inspections (i.e., within <del>ten (10) business</del> <i>forty-five (45) calendar</i> days), a cross-section of neighborhoods, and a cross-section of inspectors.</p>
<p><b><u>10.8 EMERGENCY REPAIR ITEMS</u></b></p> <p>... The following items are considered of an emergency nature and must be corrected by the owner or voucher holder (whoever is deemed responsible) within twenty-four (24) hours of notice by the inspector:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Rat infestation</li> <li>• Unsecure or broken exterior doors or windows</li> </ul>	10-9	<p>Adding two items to emergency repair list:</p> <p>... The following items are considered of an emergency nature and must be corrected by the owner or voucher holder (whoever is deemed responsible) within twenty-four (24) hours of notice by the inspector:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Rat infestation</li> <li>• Unsecure or broken exterior doors or windows</li> <li>• <i>Severe mold-like citing's</i></li> <li>• <i>Asbestos-like citing's</i></li> </ul>
<p><b><u>10.8 EMERGENCY REPAIR ITEMS</u></b></p> <p><b>10.8.1 HQS Site and Neighborhood Conditions</b></p> <p>... HCVP Inspectors will also inspect site and neighborhood conditions. The site and neighborhood must be reasonably free from disturbing noises and reverberations or other dangers to health, safety, and general welfare of the occupants. Examples of conditions that would “seriously and continuously endanger the health or safety of the residents” are:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Proximity to open sewage;</li> <li>• Unprotected heights;</li> <li>• ...</li> </ul>	10-10	<p>Adding one item to site and neighborhood conditions list:</p> <p>... HCVP Inspectors will also inspect site and neighborhood conditions. The site and neighborhood must be reasonably free from disturbing noises and reverberations or other dangers to health, safety, and general welfare of the occupants. Examples of conditions that would “seriously and continuously endanger the health or safety of the residents” are:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Proximity to open sewage;</li> <li>• <i>Rodent, animal and insect infestations;</i></li> <li>• Unprotected heights;</li> <li>• ...</li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 10: HOUSING QUALITY STANDARDS AND INSPECTIONS (Continued)

<p><b><u>10.10 DETERMINATION OF RESPONSIBILITY</u></b></p> <p>...Certain HQS deficiencies are considered the responsibility of the family:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• Damage to the unit or premises...</li> </ul> <p>The owner is responsible for all other HQS violations. Failure to allow owner's access to the assisted unit to make HQS repairs as cited by HABC is a violation of family obligations and may result in referral for termination of participation in the HCV Program.</p> <p>The owner is responsible for vermin infestation even if caused by the family's living habits. However, if such infestation is serious and repeated, it may be considered a lease violation and the owner may evict for serious or repeated violation of the lease. HABC may terminate the family's assistance on that basis.</p> <p>The inspector will make a determination of owner or family responsibility during the inspection.</p>	<p>10-11</p>	<p>Adding housekeeping violations as a family responsibility:</p> <p>...Certain HQS deficiencies are considered the responsibility of the family:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Damage to the unit or premises...</li> <li>• <i>Failure to maintain housekeeping responsibilities that lead to unsafe and unsanitary conditions, and possibly serious lease violations.</i></li> </ul> <p><u>The owner is responsible for vermin infestation even if caused by the family's living habits. However, if such infestation is serious and repeated, it may be considered a lease violation and the owner may evict for serious or repeated violation of the lease. HABC may terminate the family's assistance on that basis. Family obligations prohibit voucher holders from committing serious or repeated lease violations, and may result in referral for termination of assistance (see Chapter 15, Section 15.7) and participation in the HCV Program.</u></p> <p><del>The owner is responsible for all other HQS violations.</del> Failure to allow owner's access...</p> <p><del>The owner is responsible for vermin infestation even if caused by the family's living habits. However, if such infestation is serious and repeated, it may be considered a lease violation and the owner may evict for serious or repeated violation of the lease. HABC may terminate the family's assistance on that basis.</del></p> <p>The inspector will make a determination of owner or family responsibility during the inspection.</p>
<p><b><u>10.11 CONSEQUENCES IF FAMILY IS RESPONSIBLE</u></b></p> <p>If emergency violations of HQS are determined to be the responsibility of the family, HABC will require either the landlord or the family to make repair(s) and/or correction(s) within twenty-four (24) hours. If the emergency repair items are not corrected in the time period required by HABC and it is an HQS breach that is a family obligation, HABC may terminate assistance to the family.</p> <p>If non-emergency violations of HQS are determined to be the responsibility of the family, HABC will require the landlord make any repair(s) or the family to make corrections within thirty (30) calendar days.</p> <p>In either case, the landlord may charge the voucher holder for the cost of the repairs. If the repair(s) or correction(s) are not made in the time period required by HABC, HABC will terminate assistance to the family, after providing an opportunity for an informal hearing...</p>	<p>10-11 to 10-12</p>	<p>Revising language to read more clearly:</p> <p>If emergency violations of HQS are determined to be the responsibility of the family, HABC will require <del>either the landlord or</del> the family to make repair(s) and/or correction(s) within twenty-four (24) hours. <del>If the emergency repair items are not corrected in the time period required by HABC and it is an HQS breach that is a family obligation, HABC may terminate assistance to the family.</del></p> <p>If non-emergency violations of HQS are determined to be the responsibility of the family, HABC will require <del>the landlord make any</del> repair(s) or the family to make corrections within thirty (30) calendar days.</p> <p><del>In either case, the landlord may charge the voucher holder for the cost of the repairs.</del> If the repair(s) or correction(s) are not made in the time period required by HABC, HABC <del>will</del> <i>may</i> terminate assistance to the family, <del>after providing an opportunity for an informal hearing...</del></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 10: HOUSING QUALITY STANDARDS AND INSPECTIONS (Continued)

<p><b><u>10.12 INSPECTION RULES, PROCEDURES AND FORMS</u></b></p> <p><b>10.12.2 Winter Waiver</b></p> <p>...However, during this period owners will be obligated to scrape any loose, chipping or peeling paint...</p>	10-12	<p>Revising language to reflect more accurate statement:</p> <p>...However, during this period owners will be obligated to <del>scrape</del> <i>remove</i> any loose, chipping or peeling paint...</p>
<p><b><u>10.12 INSPECTION RULES, PROCEDURES AND FORMS</u></b></p> <p><b>10.12.3 Paperwork Reduction Act</b></p> <p>In accordance with the Paperwork Reduction Act of 1995, HABC HCVP will require that all HCV landlords/owners receive all communication through email. HCVP is also seeking HUD approval to charge Administrative Fees to landlords that do not wish to participate in the paperless policy and also in making this policy mandatory for all landlords to comply. HCVP will apply this policy to all paper statements/letters, including but not limited to inspection reports and paper checks.</p>	10-13	<p>This activity was approved; revising language to reflect present tense and updated policy:</p> <p>In accordance with the Paperwork Reduction Act of 1995, HABC HCVP <del>will require requests</del> that all HCV landlords/owners receive all communication through email. HCVP <del>is also seeking</del> <i>has received</i> HUD approval to charge <del>Administrative Fees to</del> landlords that do not wish to participate in the paperless policy <del>and also in making this policy mandatory for all landlords to comply but has not implemented this policy at this time.</del> HCVP <del>will</del> <i>may</i> apply this policy to all paper statements/letters, including but not limited to inspection reports and paper checks, <i>at any time.</i></p> <p><i>It's important to note that HABC will provide advanced notice to all landlords prior to implementing this policy in the future.</i></p>

## Chapter 11: OWNER RENTS, RENT REASONABLENESS, AND PAYMENT STANDARDS

<p><b><u>11.3 MAKING PAYMENTS TO OWNERS</u></b></p> <p><b>11.3.1 Direct Deposit</b></p> <p>...Property owners and agents may be charged a fee up to one percent (1%) of the HAP for paper statements and checks, of which will be available for pick up at the Fiscal Operations Office located at 417 East Fayette St, Baltimore, MD 21202...</p>	11-1	<p>Updating language to match current policy:</p> <p>...Property owners and agents may <del>be charged a fee up to one percent (1%) of the HAP for elect to receive</del> paper statements and checks, <del>of which however they will only</del> be available for pick up at the Fiscal Operations Office located at 417 East Fayette St, Baltimore, MD 21202. <i>Paper statements and checks will not be mailed...</i></p>
<p><b><u>11.3 MAKING PAYMENTS TO OWNERS</u></b></p> <p><b>11.3.2 Paperwork Reduction Act</b></p> <p>In accordance with the Paperwork Reduction Act of 1995, HABC HCVP will require that all HCV landlords/owners receive all communication through email. HCVP is also seeking HUD approval to charge Administrative Fees to landlords that do not wish to participate in the paperless policy and also in making this policy mandatory for all landlords to comply. HCVP will apply this policy to all paper statements/letters, including but not limited to inspection reports and paper checks.</p>	11-2	<p>This activity was approved; revising language to reflect present tense and updated policy:</p> <p>In accordance with the Paperwork Reduction Act of 1995, HABC HCVP <del>will require requests</del> that all HCV landlords/owners receive all communication through email. HCVP <del>is also seeking</del> <i>has received</i> HUD approval to charge <del>Administrative Fees to</del> landlords that do not wish to participate in the paperless policy <del>and also in making this policy mandatory for all landlords to comply but has not implemented this policy at this time.</del> HCVP <del>will</del> <i>may</i> apply this policy to all paper statements/letters, including but not limited to inspection reports and paper checks, <i>at any time.</i></p> <p><i>It's important to note that HABC will provide advanced notice to all landlords prior to implementing this policy in the future.</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 11: OWNER RENTS, RENT REASONABLENESS, AND PAYMENT STANDARDS (Continued)

<p><b><u>11.6 ADJUSTMENTS TO PAYMENT STANDARDS</u></b></p> <p><b>11.6.2 Raising and Lowering of the Payment Standard</b></p> <p>NO CURRENT POLICY</p>	11-5	<p>Adding the HOLD HARMLESS POLICY approved by Board of Commissioners on November 29, 2018:</p> <p><i>When the applicable payment standards decrease, HABC will adopt the Housing Opportunity through Modernization Act of 2016 (HOTMA) Hold Harmless Policy. The Hold Harmless Policy provides that if the payment standard changes, resulting in lower payment standard amounts and increased tenant portions, HABC will not reduce the standard used to calculate the subsidy for families already under HAP contract at the time of the decrease.</i></p> <p><i>The Hold Harmless Policy allows families who remain in their unit to maintain their current payment standard for as long as they remain in that same unit, or until the payment standard increases. New admissions and families that move from their existing units into new units will have the applicable decreased payment standards applied to their new HAP Contracts. Applying this policy provides protection to HABC families so that their payment standard will not decrease while living in their current units.</i></p>
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## Chapter 12: REEXAMINATIONS

<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p>HABC is responsible for reexamination and verification of household income, household composition and other eligibility data...</p>	12-1	<p>Adding the ONLINE REEXAMINATION POLICY approved by the Board of Commissioners on November 30, 2018:</p> <p>HABC is responsible for reexamination and verification of household income, household composition and other eligibility data. <i>HABC will implement online reexamination processes in FY2019, as a three- to six-month pilot program for a representative selection of participants. Upon completion of the pilot, HABC will implement the online reexamination policy for all participants. See Section 12.2.7 for more information on the online reexamination process...</i></p>
<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p><b>12.2.1 Reexamination Notice to the Household</b></p> <p>HABC will maintain a reexamination tracking system and the household will be notified by mail of the deadline for return of required reexamination forms and documentation at least sixty (60) calendar days in advance of the reexamination effective date (the date that any changes in household rent share take effect)...</p>	12-2	<p>Updating language to reflect current policy and clarify process:</p> <p>HABC will maintain a reexamination tracking system and the household will be notified by mail of <del>the deadline for return of required reexamination forms and documentation</del> <i>their reexamination appointment date</i> at least sixty (60) calendar days in advance of the reexamination effective date (the date that any changes in household rent share take effect). <i>The notice will inform participants of the required documentation that will be needed at the time of their recertification appointment. All household members who are or will be 18 years of age by the recertification effective date are required to attend the appointment and provide signatures on all required documents...</i></p>
<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p><b>12.2.2 Completion of Reexaminations</b></p> <p>HABC will have all reexaminations for households completed before the anniversary date. This includes notifying the household of any changes in rent at least thirty (30) calendar days before the scheduled date of the change in household rent...</p>	12-2	<p>Updating language to reflect current policy and clarify process:</p> <p>HABC will <del>have complete</del> all reexaminations for households <del>completed</del> before the anniversary date. This includes notifying the household of any changes in rent at least thirty (30) calendar days before the <del>scheduled reexamination effective date of the change in household rent</del>, <i>provided there are no delays caused by the household that is being recertified...</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 12: REEXAMINATIONS (Continued)

<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p>NO CURRENT POLICY</p>	12-3	<p>Adding the HOLD HARMLESS POLICY approved by Board of Commissioners on November 29, 2018:</p> <p><b><i>12.2.7 Online Reexamination Process</i></b>  <i>In June, 2019, HABC started the implementation of a three- to six-month pilot online reexamination process for a representative selection of participants. HABC plans to make online reexaminations available to all HCV Program participants.</i></p> <p><i>This pilot program will not change the requirements of the reexamination process, only how the reexamination is completed. HABC's goal is to create a more efficient process for participants to submit the documentation required to complete their reexaminations. Online reexaminations will eliminate the requirement for participants to come into the office and staff will no longer have to manually track reexaminations, allowing for more efficient processing while improving customer service.</i></p> <p><i>The most significant component of this pilot program is the Resident Portal ("the Portal"), a website that is accessible to all HCV participants, providing them access to view and submit their reexaminations. The Resident Portal allows participants to upload the required verification documents, which were traditionally collected at the interview. It also displays the family composition, income, assets, and expenses listed on the current (effective) reexamination enabling the participants to review and update this information online.</i></p> <p><i>At the commencement of the pilot online reexamination process, an invitation letter will be sent to participants with upcoming annual reexaminations. The letter will give participants an overview of how to complete their reexamination on the Portal. It will also provide participants with the information they will need to register on the Resident Portal.</i></p>
<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p><b>12.2.7 Household Rent Increases</b></p> <p>If the household rent increases, a "thirty (30) day" notice will be mailed to the household prior to the effective date of the reexamination.</p> <p>If less than thirty (30) days are remaining before the effective date of the reexamination, the household rent increase will be effective on the first of the month following the "thirty day" notice.</p> <p>If there has been a misrepresentation or a material omission by the household, or if the household causes a delay in the reexamination processing, there will be a retroactive increase in household rent to the scheduled effective date. The household will be required to reimburse HABC for any housing assistance overpayment.</p>	12-3	<p>Updating language to reflect current policy (section # updated to 12.2.8):</p> <p><b><i>12.2.8 Household Rent Increases</i></b>  <i>Increases in income (see Section 12.3.1.) may result in an increase in the household rent, and must be reported to HABC within thirty (30) calendar days of the date the change occurred.</i></p> <p>If the household rent increases, a "thirty (30) <i>calendar</i> day" notice will be mailed to the household prior to the effective date of the reexamination, <i>provided there are no delays caused by the household that is being recertified.</i></p> <p>If less than thirty (30) <i>calendar</i> days are remaining before the effective date of the reexamination, the household rent increase will be effective on the first of the month following the "thirty day" notice, <i>provided there are no delays caused by the household that is being recertified.</i></p> <p><i>...Reporting of applicable changes in household income may trigger an interim reexamination (see Section 12.3.1.).</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 12: REEXAMINATIONS (Continued)

<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p><b>12.2.8 Household Rent Decreases</b></p> <p>If the household rent decreases, it will be effective on the effective date of the reexamination.</p> <p>If the household causes a delay so that the processing of the reexamination is not completed by the scheduled effective date, there will be no retroactive decrease in rent to the scheduled effective date. The decrease shall be effective as of the following HAP payment cycle.</p>	12-3	<p>Updating language to reflect current policy (section # updated to 12.2.9):</p> <p><b>12.2.9 Household Rent Decreases</b></p> <p>If the household rent decreases, it will be effective on the effective date of the reexamination.</p> <p><i>HABC may, at any time, require a program participant to provide evidence that the circumstances leading to a rent decrease remain in effect. Furthermore, the participant is required to report such changes within thirty (30) calendar days of their occurrence (see section 12.3.1 Interim Reexamination Prompted by Changes in Income and section 12.3.3 Interim Reexamination Prompted by Changes in Household Composition).</i></p> <p>If the household causes a delay so that the processing of the reexamination is not completed by the scheduled effective date, there will be no retroactive decrease in rent to the scheduled effective date. The decrease shall be effective as of the following HAP payment cycle.</p>
<p><b><u>12.2 REEXAMINATIONS</u></b></p> <p><b>12.2.9 Reexaminations Prompted by Moves outside the Jurisdiction (Port-Outs)</b></p> <p>If the household rent decreases, it will be effective on the effective date of the reexamination.</p> <p>If the household causes a delay so that the processing of the reexamination is not completed by the scheduled effective date, there will be no retroactive decrease in rent to the scheduled effective date. The decrease shall be effective as of the following HAP payment cycle.</p>	12-3 to 12-4	<p>REMOVED THIS SECTION ENTIRELY</p> <p>This section does not apply and is not a part of current HCVP policy.</p>
<p><b><u>12.3 INTERIM REEXAMINATIONS</u></b></p> <p>...Interims will be conducted for decreases in income, increases in income by more than \$200 per week (\$400 biweekly, \$800 monthly, \$9,600 annually) and family composition changes. Increases in income that are less than \$200 per week may be reported at the next scheduled full reexamination...</p>	12-4	<p>Removing monetary amounts, and revising language to reflect new policy:</p> <p>...Interims will be conducted for decreases in income, increases in income <del>by more than \$200 per week (\$400 biweekly, \$800 monthly, \$9,600 annually)</del> <i>when there is a change in employment status (only if going from not working to working, or from part-time to full-time employment), and family composition changes. Increases in income that are less than \$200 per week may be reported at the next scheduled full reexamination...</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 12: REEXAMINATIONS (Continued)

<p><b><u>12.3 INTERIM REEXAMINATIONS</u></b></p> <p>NO CURRENT POLICY</p>	12-4	<p>Adding language regarding proposed policy to LIMIT INTERIMS pending HUD approval of the FY2020 Admin Plan:</p> <p><i>In FY2019, HABC may limit the number of voluntary interim reexaminations that occur between each regular reexamination cycle. If an interim reexam is required, HABC will not count it against the limit on voluntary interims (i.e. changes in family composition, etc.). Elderly/disabled families, and families in the Family Self-Sufficiency (FSS) program are exempt from the limit on interim reexaminations.</i></p> <p><i>Voluntary interim reexaminations may be limited to the following:</i></p> <ul style="list-style-type: none"> <li>• One (1) voluntary interim reexamination between annual reexaminations for families on an annual reexam schedule.</li> <li>• Two (2) voluntary interim reexaminations between biennial reexaminations for families on a biennial schedule.</li> <li>• Three (3) voluntary interim reexaminations between triennial reexaminations for families on a triennial schedule.</li> </ul> <p><i>Families whose loss of income represents a 20% reduction in gross annual income, and where the loss of income is beyond the family's control, will be able to request an exemption to the limit on interim reexaminations to allow for an additional interim to be conducted. Currently and continuing, any household that believes they would benefit by an annual reexamination may request an annual income reexamination schedule.</i></p>
<p><b><u>12.3 INTERIM REEXAMINATIONS</u></b></p> <p><b>12.3.1 Interim Reexaminations Prompted by Changes in Income</b></p> <p>Households may request interim reexaminations. Circumstances, which fall under interim reexaminations, include but may not be limited to:</p> <ul style="list-style-type: none"> <li>• Decreases in Gross Income;</li> <li>• Increases in allowances or deductions (see Section 12.3.4)</li> <li>• When the households weekly gross income has increased by more than \$200 per week (\$400 biweekly, \$800 monthly, \$9,600 annually). The \$200 per week increase may be the cumulative result of multiple increases in family income over time...</li> </ul>	12-4	<p>Removing monetary amounts, and revising language to reflect new policy:</p> <p>Households may request interim reexaminations. Circumstances, which fall under interim reexaminations, include but may not be limited to:</p> <ul style="list-style-type: none"> <li>• Decreases in Gross Income;</li> <li>• Increases in allowances or deductions (see Section 12.3.4)</li> <li>• When the households weekly gross income has increased <del>by more than \$200 per week (\$400 biweekly, \$800 monthly, \$9,600 annually). The \$200 per week increase may be the cumulative result of multiple increases in family income over time as a result of a change in employment status (only if going from not working to working, or from part-time to full-time employment)...</del></li> </ul>
<p><b><u>12.3 INTERIM REEXAMINATIONS</u></b></p> <p><b>12.3.6 Interim Reexamination Prompted by Temporary or Sporadic Income</b></p> <p>...An interim reexamination review will be completed (as reported) every one hundred twenty (120) calendar days for households reporting only temporary or sporadic income...</p>	12-6	<p>Removing frequency and updating language to reflect current policy:</p> <p>...An interim reexamination review will be completed (as reported) <del>every one hundred twenty (120) calendar days</del> for households reporting only <del>temporary or</del> sporadic income <del>with the same frequency as zero income families (see Section 12.3.5). Temporary income is annualized at the time of reexamination...</del></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 13: MOVES WITH CONTINUED ASSISTANCE AND PORTABILITY

<p><b><u>13.2 ALLOWABLE MOVES</u></b></p> <p>HABC may deny permission to move if:</p> <ul style="list-style-type: none"> <li>• The family has violated a family obligation.</li> <li>• The family owes HABC money.</li> <li>• The family has moved within the previous 12 months.</li> </ul>	13-1	<p>Updating to reflect current policy:</p> <p>HABC may deny permission to move if:</p> <ul style="list-style-type: none"> <li>• The family has violated a family obligation.</li> <li>• The family owes HABC money.</li> <li>• The family <i>is within the initial term of the lease, or</i> has moved within the previous 12 months.</li> </ul>
<p><b><u>13.4 PROCEDURE FOR MOVES</u></b></p> <p><b>13.4.1 Issuance of Voucher</b></p> <p>Subject to the restrictions on moves HABC will issue the voucher to move. If the family does not locate a new unit, they may remain in the current unit so long as the owner permits. The scheduled reexamination date may be changed to coincide with the new lease up date.</p>	13-2	<p>Updating to reflect current policy:</p> <p>Subject to the restrictions on moves HABC will issue the voucher to move. If the family does not locate a new unit, they may remain in the current unit so long as the owner permits. <del>The scheduled reexamination date may be changed to coincide with the new lease up date.</del></p>
<p><b><u>13.5 PORTABILITY</u></b></p> <p>Portability applies to families moving out of or into HABC's jurisdiction within the United States and its territories. Upon HAP contract execution, the voucher holder is required to take possession of the unit.</p>	13-2	<p>Updating to reflect current policy:</p> <p>Portability applies to families moving out of or into HABC's jurisdiction within the United States and its territories. <i>HABC has the sole discretion to absorb the voucher or bill the initial jurisdiction, dependent on funding.</i> Upon HAP contract execution, the voucher holder is required to take possession of the unit.</p>
<p><b>13.5.2 Incoming Portability (port-ins)</b></p> <p>... Port-in households will be required to meet all HABC program criteria prior to being accepted (see Chapter 2, ELIGIBILITY FOR ADMISSION and Chapter 3, APPLYING FOR ADMISSION).... The participant will be issued a voucher by HABC which will expire thirty (30) calendars days after the initial PHA's voucher expires, as per HUD regulations...</p>	13-4	<p>Updating to reflect current policy:</p> <p>... Port-in households will be required to meet all HABC program criteria prior to being accepted (see Chapter 2, ELIGIBILITY FOR ADMISSION and Chapter 3, APPLYING FOR ADMISSION).... The participant will be issued a voucher by HABC which will expire thirty (30) calendars days after the initial PHA's voucher expires, as per HUD regulations. <i>If a port-in family wishes to move outside of HABC's jurisdiction, HABC will notify the family of their responsibility to contact the initial PHA and the portability paperwork will be returned to the original jurisdiction...</i></p>
<p><b>13.5.4 Requests for Tenancy Approval (RFTA)</b></p> <p>... If the family leases up successfully, HABC will notify the initial PHA within fourteen (14) calendar days...</p>	13-5	<p>Updating to reflect current policy:</p> <p>... If the family leases up successfully, HABC will notify the initial PHA <i>within fourteen (14) calendar days prior to the billing expiration date...</i></p>
<p><b>13.5.7 Billing Procedures</b></p> <p>... HABC will notify the initial PHA of changes in subsidy amounts and will expect the initial PHA to notify HABC of changes in the administrative fee amount to be billed ...</p>	13-5	<p>Updating to reflect current policy:</p> <p>... HABC will notify the initial PHA of changes in subsidy amounts and will expect the initial PHA to notify HABC of changes in the administrative fee amount to be billed, <i>within HUD's allotted timeframe...</i></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 14: CONTRACT TERMINATIONS

<p><b><u>14.2 CONTRACT TERMINATION</u></b></p> <p>...If the family continues to occupy the unit after the HAP Contract is terminated, the family is responsible for the total amount of rent due to the owner...the family may lease-up in another unit...</p>	14-1	<p>Taking away definitive language and inserting potential language:</p> <p>...If the family continues to occupy the unit after the HAP Contract is terminated, the family is responsible for the <del>total amount of full</del> <i>contract</i> rent due to the owner...the family may lease-up in another unit <i>with a move voucher</i>...</p>
<p><b><u>14.4 TERMINATION OF TENANCY BY THE OWNER: EVICTIONS</u></b></p> <p>...During the term of the lease, the owner may only evict for:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• ...</li> </ul> <p>During the initial term of the lease, the owner may not terminate the tenancy for "other good cause" unless the owner is terminating the tenancy because of something the family did or failed to do.</p>	14-1	<p>HABC has no determination in reasons owners may evict tenants, so long as the evictions are legally presided over and authorized by judgments/court orders. Removing definitive language from this section.</p> <p>...During the term of the lease, the owner may <del>only</del> evict for:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• ...</li> </ul> <p><del>During the initial term of the lease, the owner may not terminate the tenancy for "other good cause" unless the owner is terminating the tenancy because of something the family did or failed to do.</del></p>
<p><b><u>14.4 TERMINATION OF TENANCY BY THE OWNER: EVICTIONS</u></b></p> <p><b>14.4.3 Exclusion of Culpable Household Member</b></p> <p>The owner may require a tenant to exclude a household member in order to continue to reside in the assisted unit.</p>	14-2	<p>Adding clarifying language:</p> <p><b>14.4.3 <del>Exclusion</del> <i>Removal</i> of Culpable Household Member</b></p> <p>The owner may require a tenant to <del>exclude a</del> <i>remove the culpable</i> household member(s) in order to continue to reside in the assisted unit.</p>
<p><b><u>14.5 TERMINATION OF THE CONTRACT BY HABC</u></b></p> <p><b>14.5.1 Notice of Termination</b></p> <p>When HABC terminates the HAP contract under the violation of HQS space standards, HABC will provide the owner and family written notice of termination of the contract, and the HAP contract will terminate at the end of the following calendar month after which HABC gives such notice to the owner.</p>	14-4	<p>Adding clarifying language:</p> <p>When HABC terminates the HAP contract under the violation of HQS space standards (<i>i.e. the family is under-housed</i>), HABC will <i>require the family to move</i>. HABC will provide the owner and family written notice of termination of the contract, and the HAP contract will terminate at the end of the following calendar month after which HABC gives such notice to the owner.</p>

## Chapter 15: DENIAL OR TERMINATION OF ASSISTANCE

<p><b><u>15.2 GROUNDS FOR DENAIL AND TERMINATION</u></b></p> <p>If denial or termination is based upon behavior resulting from a disability, HABC will delay the denial or termination in order to determine if there is an accommodation that would negate the behavior resulting from the disability.</p>	15-1	<p>Taking away definitive language and inserting potential language:</p> <p>If denial or termination is based upon behavior resulting from a disability, HABC <del>will</del> <i>may</i> delay the denial or termination in order to determine if there is an accommodation that would negate the behavior resulting from the disability.</p>
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FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 15: DENIAL OR TERMINATION OF ASSISTANCE (Continued)

<p><b>15.2.2 Mandatory Denial and Termination</b></p> <p>... HABC must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease.</p>	15-1	<p>Updating language to match HUD regs:</p> <p>... HABC must terminate program assistance for a family evicted from housing assisted under the program for serious <i>or repeated</i> violation(s) of the lease.</p>
<p><b>15.2.3 Grounds for Denial or Termination of Assistance</b></p> <p>HABC must deny admission to the program for applicants and terminate assistance for program participants if HABC determines that any household member is currently engaging in illegal use of a drug or abusing alcohol...</p>	15-2	<p>Updating language to match HUD regs and make the statement discretionary, not mandatory:</p> <p>HABC <del>must</del> <i>may</i> deny admission to the program for applicants and terminate assistance for program participants if HABC determines that any household member is currently engaging in illegal use of a drug or abusing alcohol...</p>
<p><b><u>15.4 DEFINITIONS OF TEMPORARILY / PERMANENTLY ABSENT</u></b></p> <p><b>15.4.2 Absence Due to Medical Reasons</b></p> <p>... If the verification indicates that the family member will return in one hundred and eighty (180) consecutive days, the family member will not be considered permanently absent.</p>	15-5	<p>Updating language to clarify current policy:</p> <p>... If the verification indicates that the family member will return in <i>less than</i> one hundred and eighty (180) consecutive days, the family member will not be considered permanently absent.</p>
<p><b>15.4.3 Absence Due to Full-time Student Status</b></p> <p>If the family decides that the member is permanently absent, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of Voucher size.</p>	15-5	<p>Updating language to clarify current policy:</p> <p>If the family decides that the member is permanently absent, <i>the member will be removed from the family composition</i>, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of Voucher size.</p>
<p><b><u>15.4 DEFINITIONS OF TEMPORARILY / PERMANENTLY ABSENT</u></b></p> <p><b>15.4.6 Absence of Entire Family</b></p> <p>..."Absence" means that no family member is residing in the unit. In order to determine if the family is absent from the unit, HABC may write letters to the family at the unit, telephone the family at the unit, interview neighbors, verify if utilities are in service or check with the post office...</p> <p>...If the entire family is absent from the assisted unit for more than twenty-nine (29) consecutive days, HABC may contact the landlord, or inspect the unit to confirm the absence... If it is determined that the unit is vacant, the participant will be referred for termination...</p>	15-6	<p>Updating language to clarify current policy:</p> <p>..."Absence <i>of Entire Family</i>" means that no family member is residing in the unit. In order to determine if the family is absent from the unit, HABC may <i>do any or all of the following: verify through the landlord the residency status of the family, request an inspection of the unit,</i> write letters to <i>and telephone</i> the family at the unit, <del>telephone the family at the unit,</del> interview neighbors, verify if utilities are in service <i>at the unit</i>, or check with the post office...</p> <p>...If the entire family is absent from the assisted unit for more than <del>twenty-nine (29)</del> <i>thirty (30)</i> consecutive days, HABC may contact the landlord, or inspect the unit to confirm the absence... If it is determined that the unit is vacant <i>because the family moved without notice</i>, the participant will be referred for termination...</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 15: DENIAL OR TERMINATION OF ASSISTANCE (Continued)

<p><b>15.4.8 Guests</b></p> <p>... Guests who remain beyond this period without HABC approval, and are considered unauthorized occupants, constitutes a violation of Family Obligations (for more information on Family Obligations, see Chapter 15, Section 15.5). <b>Live-in aides may not have overnight guests...</b></p>	15-7	<p>Copying determination of unauthorized occupancy rules to this section:</p> <p>...Guests who remain beyond this period without HABC approval, and are considered unauthorized occupants, constitutes a violation of Family Obligations (for more information on Family Obligations, see Chapter 15, Section 15.5). <b>Live-in aides may not have overnight guests...</b></p> <p><i>Determination of the unauthorized status will include any of the following:</i></p> <ul style="list-style-type: none"> <li><i>Absence of evidence of any other address will be considered verification that the guest is a member of the household.</i></li> <li><i>Statements from neighbors and/or the landlord will be considered in making the determination.</i></li> <li><i>Use of the unit address as the guest's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</i></li> <li><i>Investigations completed by HABC's Internal Investigations Unit (IIU), may result in the determination of unauthorized occupants.</i></li> </ul>
<p><b>15.4.9 Visitors</b></p> <p>... Any person, who has been in the unit more than fourteen (14) consecutive days without HABC approval, or a total of ninety (90) days in a 12-month period, will be considered to be living in the unit as an unauthorized household member.</p> <p>Determination of the unauthorized status will include any of the following:</p> <ul style="list-style-type: none"> <li>...</li> <li>Use of the unit address as the visitor's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.</li> </ul>	15-7	<p>Adding bullet regarding HABC Internal Investigations to match previous sections statement on unauthorized occupancy:</p> <p>Determination of the unauthorized status will include any of the following:</p> <ul style="list-style-type: none"> <li>...</li> <li><i>Investigations completed by HABC's Internal Investigations Unit (IIU), may result in the determination of unauthorized occupants.</i></li> </ul>
<p><b><u>15.7 FAMILY OBLIGATIONS</u></b></p> <p><b>15.7.2 Enforcing Family Obligations</b></p> <p><b><i>15.7.2.4 Notification of Eviction</i></b></p> <p>If the family submits a request for assistance to move and they did not notify HABC of an eviction within five (5) days of receiving the Notice of Lease Termination, the move may be denied.</p>	15-13	<p>Removing section as HABC policy does not permit a move if evicted from a unit while receiving assistance.</p> <p><del><b>15.7.2.4 Notification of Eviction</b></del></p> <p><del>If the family submits a request for assistance to move and they did not notify HABC of an eviction within five (5) days of receiving the Notice of Lease Termination, the move may be denied.</del></p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 15: DENIAL OR TERMINATION OF ASSISTANCE (Continued)

<p><b>15.7.2.5 When a Family Member Moves Out</b></p> <p>...When the family notifies HABC, they must furnish the following information:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• A statement as to whether the family member is temporarily or permanently absent.</li> </ul> <p>If the above information cannot be provided, HABC may proceed with other verification procedures.</p>	15-14	<p>Adding a bullet to clarify other verification may be requested:</p> <p>...When the family notifies HABC, they must furnish the following information:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• A statement as to whether the family member is temporarily or permanently absent.</li> <li>• <i>Or other verification as requested by HABC.</i></li> </ul> <p>If the above information cannot be provided, HABC may proceed with other verification procedures.</p>
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## Chapter 16: OWNER DISAPPROVAL AND RESTRICTION

<p><b>16.4 CHANGE IN OWNERSHIP</b></p> <p>...The additional information required to complete a change in ownership is listed below:</p> <ol style="list-style-type: none"> <li>1) ...</li> <li>2) ...</li> <li>3) ...</li> </ol>	16-3	<p>Updating the list of requirements for Change in Ownership to match current policy:</p> <ol style="list-style-type: none"> <li>1) ...</li> <li>2) ...</li> <li>3) ...</li> <li>14) <i>Business entities must be in good standing with the State of MD Department of Assessments &amp; Taxation (SDAT) <a href="http://www.dat.maryland.gov">www.dat.maryland.gov</a>.</i></li> <li>15) <i>Foreign Corporations (corporations not organized under the laws of Maryland) must be registered in the state of Maryland.</i></li> <li>16) <i>Owner must advise if business entity is registered and operating under a Trade Name or "Doing Business As" (DBA). The full legal name of the owner of business or individual using the Trade Name is required. Legal entities may be owners of the trade name. The legal entity must be registered with the State of Maryland Department of Assessments &amp; Taxation (SDAT) <a href="http://www.dat.maryland.gov">www.dat.maryland.gov</a>.</i></li> </ol>
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## Chapter 17: OWNER OR FAMILY DEBTS TO HABC

<p><b>17.6 GUIDELINES FOR PAYMENT AGREEMENTS</b></p> <table border="1"> <thead> <tr> <th>Initial Payment Due: (% of Total Amount)</th><th>Amount Owed</th><th>Maximum Term</th></tr> </thead> <tbody> <tr> <td>25%</td><td>0 - \$500</td><td>6 months</td></tr> <tr> <td>25%</td><td>\$501- \$1,000</td><td>12 months</td></tr> <tr> <td>50%</td><td>\$1,001 - \$2,500</td><td>24 months</td></tr> </tbody> </table> <p>Additional Monies Owed:...</p> <ul style="list-style-type: none"> <li>• HABC will not enter into more than one payment agreement with the family...</li> </ul>	Initial Payment Due: (% of Total Amount)	Amount Owed	Maximum Term	25%	0 - \$500	6 months	25%	\$501- \$1,000	12 months	50%	\$1,001 - \$2,500	24 months	17-4	<p>Updating maximum term length – 18 months:</p> <table border="1"> <thead> <tr> <th>Initial Payment Due: (% of Total Amount)</th><th>Amount Owed</th><th>Maximum Term</th></tr> </thead> <tbody> <tr> <td>25%</td><td>0 - \$500</td><td>6 months</td></tr> <tr> <td>25%</td><td>\$501- \$1,000</td><td>12 months</td></tr> <tr> <td>50%</td><td>\$1,001 - \$2,500</td><td><del>24</del> 18 months</td></tr> </tbody> </table> <p>Additional Monies Owed:...</p> <p>HABC will not enter into more than one payment agreement with the family <i>and the family may be referred for termination...</i></p>	Initial Payment Due: (% of Total Amount)	Amount Owed	Maximum Term	25%	0 - \$500	6 months	25%	\$501- \$1,000	12 months	50%	\$1,001 - \$2,500	<del>24</del> 18 months
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FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 18: COMPLAINTS AND APPEALS

<p><b><u>18.1 INTRODUCTION</u></b></p> <p>The informal review for applicants and the informal hearing for participants as defined in HUD regulation...</p>	18-1	<p>Adding introductory sentence:</p> <p><i>Complaints and appeals are made through the form of Informal Reviews for applicants and Informal Hearings for participants. <u>Information on HABC's informal hearings will be provided to families in the voucher briefing.</u></i></p> <p>The informal review for applicants and the informal hearing for participants as defined in HUD regulation...</p>
<p><b><u>18.2 INQUIRIES TO HABC</u></b></p> <p>HABC will responds promptly to inquiries from families, owners, employees, and members of the public. All inquiries will be documented, researched and resolved. Applicants may request an informal review to discuss HABC determinations that affect their eligibility. Participants may request an informal hearing to discuss HABC determinations that affect their continued participation in the HCVP.</p> <p>Information on HABC's informal reviews and informal hearing procedures will be provided to families in the voucher briefing packet.</p>	18-1	<p>Moved and removed language that does not pertain to inquiries to HABC:</p> <p>HABC will responds promptly to inquiries from families, owners, employees, and members of the public. All inquiries will be documented, researched and resolved. <del>Applicants may request an informal review to discuss HABC determinations that affect their eligibility. Participants may request an informal hearing to discuss HABC determinations that affect their continued participation in the HCVP.</del></p> <p><del>Information on HABC's informal reviews and informal hearing procedures will be provided to families in the voucher briefing packet.</del></p>
<p><b><u>18.4 INFORMAL REVIEW PROCEDURES FOR APPLICANTS</u></b></p> <p>...The exception is when an applicant is denied assistance for citizenship or eligible immigrant status, the applicant is not entitled to an informal review.</p> <p>...</p> <p>HABC must provide applicants with the opportunity for an informal review of decisions denying:</p> <ul style="list-style-type: none"> <li>• Listing on HABC's waiting list</li> <li>• Issuance of a voucher</li> <li>• Participation in the program</li> <li>• Assistance under portability procedures</li> </ul> <p>Informal reviews are not required for established policies and procedures and HABC determinations such as:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Refusal to extend or suspend a voucher</li> <li>• ...</li> <li>• Determination that unit is not in compliance with HQS...</li> </ul>	18-1 to 18-2	<p>Combined this section with the previous section <b><u>18.3 APPLICANT DENIALS AND INFORMAL REVIEWS</u></b> and added statement as per HUD regulations:</p> <p>...The exception is when an applicant is denied assistance for citizenship or eligible immigrant status, the applicant is not entitled to an informal review, <i>but may request an information hearing (see Chapter 15, Section 15.8.1.).</i></p> <p>Removing listing of when HABC must provide applicants with opportunity for an informal review because HUD's listing is more clear:</p> <p><del>HABC must provide applicants with the opportunity for an informal review of decisions denying:</del></p> <ul style="list-style-type: none"> <li><del>• Listing on HABC's waiting list</del></li> <li><del>• Issuance of a voucher</del></li> <li><del>• Participation in the program</del></li> <li><del>• Assistance under portability procedures</del></li> </ul> <p>Informal reviews are not required for established policies and procedures and HABC determinations such as:</p> <ul style="list-style-type: none"> <li>• ...</li> <li><del>• Refusal to extend or suspend a voucher HABC determination not to approve an extension or suspension of the voucher term.</del></li> <li>• ...</li> <li>• <i>HABC determination that unit selected by the applicant</i> is not in compliance with HQS...</li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 18: COMPLAINTS AND APPEALS

<p><b><u>18.4 INFORMAL REVIEW PROCEDURES FOR APPLICANTS</u></b></p> <p><b>18.4.1 Procedure for Informal Review</b></p> <p>...Requests beyond 14 days will be given at the discretion of the Deputy Chief or designee. The informal review will be scheduled within 14 business days from the date the request is received. The person who made or approved the decision, or a subordinate of that person may not conduct the review...</p> <p>...The review may be conducted by mail and/or telephone if acceptable to both parties...</p>	<p>18-2</p>	<p>Clarifying language and policy:</p> <p>...Requests beyond 14 <i>calendar</i> days will be given at the discretion of the Deputy Chief or designee. The informal review will be scheduled within 14 <i>business calendar</i> days from the date the request is received. The person who made or approved the decision <i>to deny assistance</i>, or a subordinate of that person may not conduct the review...</p> <p>...The review may be conducted by <del>mail and/or</del> <i>in person or by</i> telephone if acceptable to both parties...</p>
<p><b><u>18.5 INFORMAL HEARING PROCEDURES</u></b></p> <p>...HABC must provide participants with the opportunity for an informal hearing for decisions related to any of the following HABC determinations:</p> <ul style="list-style-type: none"> <li>• Determination of the family's annual or adjusted income and the computation of the housing assistance payment.</li> <li>• Appropriate utility allowance used from schedule</li> <li>• Family unit size determination under HABC subsidy standards</li> <li>• Determination to terminate assistance for any reason.</li> <li>• Determination to terminate a family's FSS contract, to withhold supportive services, or propose forfeiture of the family's escrow account.</li> </ul>	<p>18-3</p>	<p>Making language match HUD regulations verbatim:</p> <p>...HABC must <del>provide give a</del> participants family <del>with</del> the opportunity for an informal hearing <i>to consider whether the following HABC for</i> decisions relating <i>to the individual circumstances of a participant family</i> <del>for any of the following HABC determinations:</del></p> <ul style="list-style-type: none"> <li>• <i>HABC determination of the family's annual or adjusted income and the use of such income to compute of the housing assistance payment.</i></li> <li>• <i>HABC determination of the appropriate utility allowance (if any) for tenant-paid utilities from HABC's utility allowance used from</i> schedule.</li> <li>• <i>HABC determination of family unit size determination</i> under HABC subsidy standards.</li> <li>• <i>HABC determination to terminate assistance for a participant family because of the family's action or failure to act (see 24 CFR 982.552)-any reason.</i></li> <li>• <i>HABC determination to terminate assistance because the participant family has been absent from the assisted unit for longer than the maximum period permitted under HABC policy and HUD rules.</i></li> <li>• <del>Determination to terminate a family's FSS contract, to withhold supportive services, or propose forfeiture of the family's escrow account.</del></li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 19: SPECIAL HOUSING TYPES

<p><b>19.7 HOMEOWNERSHIP</b></p> <p><b>19.7.1 Eligibility Requirements</b></p> <p>...The family must meet all of the requirements listed below before the commencement of homeownership assistance:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• The family must meet the Federal minimum income requirement.</li> <li>• The family must have a gross annual income equal to the Federal minimum hourly wage multiplied by 2000 hours, based on the income of adult family members who will own the home.</li> <li>• ...</li> </ul>	<p>19-6 to 19-7</p>	<p>Updating language to reflect current policy and practice:</p> <p>...The family must meet all of the requirements listed below before the commencement of homeownership assistance:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• The family must meet the Federal minimum income requirement. <ul style="list-style-type: none"> <li>◦ <i>Disabled families must receive the maximum monthly Federal Supplemental Security Income (SSI) benefits.</i></li> <li>◦ <i>In cases of other non-disabled families, at least one adult family member who will own the home</i> <del>The family</del> must have a gross annual income equal to the Federal minimum hourly wage multiplied by 2,000 hours, <del>based on the income of adult family members who will own the home.</del></li> </ul> </li> <li>• ...</li> </ul>
<p><b>19.7.2 Exceptions to the Employment and/or Income Requirements</b></p> <p>An exception from the minimum employment requirements stated above...subject to the following:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Employment on a full-time basis for at least six (6) months following graduation or completion of degree or certification program.</li> </ul> <p>An exception from the minimum employment requirements stated above will be granted to one or more adult members of the family who own the home and whose employment provides an income, individually or combined, which exceeds the required income threshold...</p>	<p>19-7 to 19-8</p>	<p>Updating language to reflect current policy and practice:</p> <p>An exception from the minimum employment requirements stated above...subject to the following:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Employment on a full-time basis for at least six (6) months <i>in their field of study, immediately</i> following graduation or completion of degree or certification program.</li> </ul> <p>An exception from the minimum employment requirements <del>stated above</del> will be granted to one or more adult members of the family who <i>will</i> own the home and whose employment provides an income, <del>individually or combined,</del> which exceeds the required income threshold...</p>
<p><b>19.7.4 Eligible Units</b></p> <p>The unit must meet HUD's "Eligible Housing" requirements and meet all of the following requirements:</p> <ul style="list-style-type: none"> <li>• The unit already exists or is under construction at the time the family was determined eligible for homeownership assistance.</li> <li>• ...</li> <li>• The unit has been inspected by HABC and by an independent inspector designated by the family.</li> <li>• ...</li> </ul> <p>The unit may not be any of the following:</p> <ul style="list-style-type: none"> <li>• A public housing or Indian housing unit;</li> <li>• A unit receiving Section 8 project-based assistance;</li> <li>• ...</li> </ul>	<p>19-8</p>	<p>Updating language to reflect current policy and practice:</p> <p>The unit must meet HUD's "Eligible Housing" requirements and meet all of the following requirements:</p> <ul style="list-style-type: none"> <li>• <i>The unit is located within the jurisdiction of Baltimore City.</i></li> <li>• The unit already exists or is under construction at the time the family was determined eligible for homeownership assistance.</li> <li>• ...</li> <li>• The unit has <del>been inspected</del> <i>passed inspection</i> by HABC and by an independent inspector designated by the family, <i>an meets all lead safety standards.</i></li> <li>• ...</li> </ul> <p>The unit may not be any of the following:</p> <ul style="list-style-type: none"> <li>• <del>A public housing or Indian housing unit;</del></li> <li>• A unit receiving <del>Section 8 Housing Choice Voucher</del> project-based assistance;</li> <li>• ...</li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 19: SPECIAL HOUSING TYPES (Continued)

<p><b>19.7 HOMEOWNERSHIP</b></p> <p><b>19.7.5 HABC Search and Purchase Requirements</b></p> <p>HABC has established the maximum time that will be allowed for a family to locate and purchase a home. The family's deadline date for locating a home to purchase will be one hundred and twenty (120) calendar days from the date the family's eligibility for the homeownership option is determined. The family must obtain financing for the home within 120 calendar days of the eligibility date for the homeownership program is determined. The family must purchase the home within one hundred and eighty (180) calendar days of the date eligibility for the homeownership program was determined...</p>	19-9	<p>Updating language to reflect current policy and practice:</p> <p>HABC has established the maximum time that will be allowed for a family to locate and purchase a home. <del>The family's deadline date for locating a home to purchase will be one hundred and twenty (120) calendar days from the date the family's eligibility for the homeownership option is determined.</del> The family must <i>locate a home to purchase</i>, obtain financing, <i>and submit all required documents including passed inspection and appraisal reports</i> for the home within <i>one-hundred twenty (120) calendar days of the date that eligibility date</i> for the homeownership program is determined. <i>If additional time is required to obtain final loan commitments or closing cost assistance from a government agency, the family may receive a 60-day extension; however</i> <del>the family must purchase the home within one-hundred and</del> eighty (180) calendar days of the date eligibility for the homeownership program was determined.</p>
<p><b>19.7.6 Inspection and Contract</b></p> <p>...The independent inspector must not be a HABC employee or contractor...Copies of the independent inspection report will be provided to the family and HABC...</p> <p>...The family must enter into a contract of sale with the seller of the unit...The contract of sale must specify the price and terms of sale, and provide that the purchaser will arrange for a pre-purchase independent inspection of the home...</p>	19-9 to 19-10	<p>Updating language to reflect current policy and practice:</p> <p>...The independent inspector must not be a HABC employee<del> or contractor</del>...Copies of the independent inspection report <del>will</del> <i>must</i> be provided to the family and HABC...</p> <p>...The family must enter into a contract of sale with the seller of the unit...The contract of sale must specify the price and terms of <i>the</i> sale <i>(the property must appraise at or above the sale price)</i>, and provide that the purchaser will arrange for a pre-purchase independent inspection of the home...</p>
<p><b>19.7.7 Financing</b></p> <p>...HABC will prohibit the following forms of financing:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...</li> <li>• Seller financing</li> <li>• Second mortgage financing</li> <li>• Refinancing with Cash Out Option</li> </ul>	19-10	<p>Updating language to reflect new policy:</p> <p>...HABC will prohibit the following forms of financing:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Seller financing <i>(HABC may grant an exception in consideration of loans made by entities such as Habitat for Humanity and Neighborhood Assistance Corporation of America (NACA) provided that the loan meets all other HABC loan requirements – HABC approval is required for such exceptions to be granted)</i></li> <li>• ...</li> <li>• <i>Closing cost assistance cannot be financed in the loan, paid in full or partial by HABC.</i></li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 19: SPECIAL HOUSING TYPES (Continued)

<p><b>19.7.8 Homeownership Payment Assistance</b></p> <p><i>19.7.8.1 Continued Assistance</i></p> <p>...The family must comply with the following obligations:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...The family must further supply any information required by HABC or HUD concerning mortgage refinancing, sale or transfer of any interest in the home, or homeownership expenses...</li> </ul> <p>...The family must comply with the following obligations:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...the homeownership assistance to the family will continue with HABC paying a higher subsidy to the family. Upon expiration of a period of up to 60 calendar days, the family must pay 30% of the monthly mortgage payment regardless of employment status. HABC will offer temporary homeownership assistance to a family separated from employment only once in a 24-month period.</li> </ul> <p>...same level of employment and/or income upon entering the program, as well as following any period of re-employment.</p>	<p>19-10 to 19-11</p>	<p>Updating language to reflect current policy:</p> <p>...The family must comply with the following obligations:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• ...The family must further supply any information required by HABC or HUD, <i>and obtain HABC prior approval</i> concerning mortgage refinancing, sale or transfer of any interest in the home, or homeownership expenses...</li> </ul> <p>...The family must comply with the following obligations:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• If the household or adult family member who owns the home is separated from his/her employment for a period of up to sixty (60) calendar days (excluding elderly or disabled families), the homeownership assistance to the family will continue <i>with upon HABC's recalculation of the Homeownership assistance based on current household income. This may result in HABC</i> paying a higher subsidy to the family <i>during the 60-day period. Upon expiration of a period of up to 60 calendar days, the family must pay 30% of the monthly mortgage payment regardless of employment status...</i></li> </ul> <p>In order to continue receiving assistance under the homeownership option (excluding elderly/disabled families) the family must maintain the same level of employment and/or income <i>as they did</i> upon entering the program, <i>or at the time of qualification for the mortgage loan (whichever is greater)</i> as well as following any period of re-employment.</p>
<p><b>19.7.9 Homeownership Assistance Payments and Homeownership Expenses</b></p> <p>...Homeownership expenses include:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Taxes and insurance.</li> <li>• HABC utility allowance used for the voucher program.</li> <li>• ...</li> </ul>	<p>19-12</p>	<p>Updating language to reflect current policy and practice:</p> <p>...Homeownership expenses include:</p> <ul style="list-style-type: none"> <li>• ...</li> <li>• Taxes and insurance.</li> <li>• <i>Ground rent, Homeowners Association Dues or Cooperative Charges.</i></li> <li>• HABC utility allowance used for the voucher program.</li> <li>• ...</li> </ul>
<p><b>19.7.10 Housing Assistance Overpayments</b></p> <p><i>19.7.10.1 Money Owed to HABC Due to an Overpayment</i></p> <p>...If the homeowner fails to report the refund, upon HABC's discovery of the refund, HABC will calculate what the subsidy amount should have been and reduce the amount of each subsequent monthly housing assistance payment to the homeowner or lender by the amount it overpaid the subsidy monthly, until it has recouped the overpayment. If HABC reduces the amount of the monthly HCVHP assistance, the homeowner will be solely responsible to pay the lender the current mortgage payment based on the reduced subsidy until the HABC has recoupled all overpayments.</p>	<p>19-13 to 19-14</p>	<p>Updating language to reflect current policy and practice:</p> <p>...If the homeowner fails to report <del>the</del> <i>any</i> refund, upon HABC's discovery of the refund, HABC will calculate <i>the amount owed to HABC. The amount owed will be based upon the percentage of the mortgage paid by HABC. HABC at its discretion, may immediately</i> <del>what the subsidy amount should have been and</del> reduce the amount of each subsequent monthly housing assistance payment to the homeowner or lender by the amount it overpaid the subsidy <i>every monthly</i>, until it has recouped the overpayment. <i>HABC may allow the participant to enter into a payment agreement not to exceed six (6) months. At HABC's discretion a payment agreement may be granted no more than two times during the Homeownership Program participation term.</i> If HABC reduces the amount of the monthly HCVHP assistance, the homeowner will be solely responsible to pay the lender the current mortgage payment based on the reduced subsidy until <del>the</del> HABC has recoupled all overpayments.</p>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 19: SPECIAL HOUSING TYPES (Continued)

<p><b>19.7 HOMEOWNERSHIP</b></p> <p><b>19.7.10 Housing Assistance Overpayments</b></p> <p><b><i>19.7.10.2 Refunds to the Participant Due to an Overpayment</i></b></p> <p>As stated above...The portion of the refund due HABC will be based on the amount it overpaid in subsidy during the period on which the refund is based. Any remaining portion of the refund will belong to the homeowner. Failure by the homeowner to reimburse the overpayments within thirty (30) calendar days of HABC's written notice to the homeowner will result in immediate suspension of all subsidy payments to the homeowner or lender until the payments are made...</p> <p>Adjustments to a homeowner's escrow account by a lender that result in higher monthly mortgage payments should also be reported to HABC as above, and appropriate adjustments will be made in the amount of the homeowner's monthly housing assistance payments.</p>	19-14	<p>Updating language to reflect current policy and practice:</p> <p>As stated above...The portion of the refund due HABC will be based on the <del>percentage of the mortgage paid by HABC amount it overpaid in subsidy</del> during the period on which the refund is based. Any remaining portion of the refund will belong to the homeowner. <del>The homeowner has five (5) business days from the date of HABC's written notice to the homeowner, to reimburse the overpayment.</del> Failure by the homeowner to reimburse the overpayments <del>will result in immediate suspension of all subsidy payments to the homeowner or lender within</del> thirty (30) calendar days <del>of after</del> HABC's written notice to the homeowner <del>and will remain suspended will result in immediate suspension of all subsidy payments to the homeowner or lender</del> until the payments are made...</p> <p>Adjustments... <del>To obtain an adjustment, the homeowner must make a written request explaining the cause or justification of the increase and supply supporting documentation that justifies their claim. A consideration will be denied if the cause of the mortgage increase was not due to increase in real property taxes or homeowner's insurance.</del></p>
<p><b>19.7.11 Delinquency in Making Monthly Mortgage Payments</b></p> <p><b><i>19.7.11.1 Suspension of Payments</i></b></p> <p>...Once HABC have received the proper documentation, HABC will remove the suspension and issue a check to the participant (additional program agreements may be initiated/required) or the mortgage servicer for the suspended amount.</p>	19-15	<p>Updating language to reflect current policy and practice:</p> <p>...Once HABC have received the proper documentation, HABC will remove the suspension <del>and issue a check to the participant</del> (additional program agreements may be initiated/required) <del>or the mortgage servicer for the suspended amount.</del></p>
<p><b>19.7.12 Mortgage Default</b></p> <p>...In determining whether to provide a family with rental assistance after a mortgage default, HABC will consider the following factors:</p> <ul style="list-style-type: none"> <li>• The reason for the mortgage default.</li> <li>• The effect of denial of rental assistance...</li> </ul>	19-15	<p>Updating language to reflect current policy and practice:</p> <p>...In determining whether to provide a family with rental assistance after a mortgage default, HABC will consider the following factors:</p> <ul style="list-style-type: none"> <li>• <del>The family did not default on a FHA-insured mortgage.</del></li> <li>• The reason for the mortgage default.</li> <li>• The effect of denial of rental assistance.....</li> </ul>
<p><b>19.7.13 Death of a Family Member</b></p> <p><b><i>19.7.13.1 Hardship</i></b></p> <p><b><i>19.7.13.2 Extended Hardship Exemption Policy</i></b></p> <p><b><i>19.7.13.2.2 Scarcity of Employment</i></b></p> <p>...To be considered for the Extended Hardship Exemption based upon a necessity of changing careers, the participant will be required to:</p> <ul style="list-style-type: none"> <li>• Provide proof of enrollment...</li> <li>• Remain employed for not less than twenty-five (25) hours a week...</li> </ul>	19-16 to 19-17	<p>Moved Hardship section up one level to make its own section (updated Section # 19.7.14)</p> <p>Updating language to reflect current policy and practice:</p> <p><b>19.7.14 Hardship Exemption Policy</b>  <b><i>19.7.14.1 Extended Hardship Exemption Policy</i></b>  <b><i>19.7.14.1.2 Scarcity of Employment</i></b></p> <p>...To be considered for the Extended Hardship Exemption based upon a necessity of changing careers, the participant will be required to: <del>provide proof of enrollment...</del></p> <ul style="list-style-type: none"> <li>• <del>Remain employed for not less than twenty-five (25) hours a week...</del></li> </ul>

FY2019 HCVP Admin Plan	Page	FY2020 HCVP Admin Plan AMENDMENTS
CURRENT POLICY	#	PROPOSED POLICY

## Chapter 20: PROJECT-BASED PROGRAM ASSISTANCE

20.13 BALTIMORE REGIONAL PROJECT-BASED PROGRAM HABC reserves the right to set-aside a specific number of project-based vouchers for a Regional Project-Based mobility program.	20-10	HABC reserves the right to set-aside a specific number of project-based vouchers for a Regional Project-Based mobility program. <a href="#">For more information on this program, please refer to the Baltimore Regional Project-Based Voucher Program Administrative Plan.</a>
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