

MINUTES FOR HOUSING COMMISSION MEETING

DATE: Tuesday, May 26 2020
TIME: 4:00 p.m.
PLACE: Housing and Community Development Department
350 West 6th Street, Room 250; Dubuque, IA 52001

Chairperson Rick Baumhover called the meeting to order at 4:02 p.m. following staff assurance of compliance with Iowa Open Meeting Law.

Commissioners Present:	Rick Baumhover	Amy Eudaley	David Wall
	Janice Craddieth	Coralita Shumaker (4:18 p.m.)	Gail Weitz
	Hilary Dalton	Suzanne Stroud	Sam Wooden

Commissioners Absent: Michelle Becwar

Staff Present:	Alexis Steger	Tonya England	Kris Neyen
	Gina Hodgson	Jerelyn O'Connor	

Public Present: Amanda Hohmann

Certification of Minutes – April 28, 2020 Housing Commission Meeting

Commissioner Amy Eudaley moved to approve the Minutes for the April 28, 2020 Housing Commission Meeting with the following change: Suzanne Stroud did not attend the April 28, 2020 Meeting. Commissioner David Wall seconded. Roll call. Eight (8) in favor. Motion passed.

Correspondence/Public Input

None

New Business

a) Housing Commission Meeting Time

The Housing Commission discussed changing the meeting time. The Housing Commissioners decided to leave the meeting time at 4 p.m. on the second Tuesday of each month.

There was no vote.

b) Administrative Plan Chapter 3 Summary

Gina Hodgson, Assisted Housing Supervisor, reviewed the proposed changes in Administrative Plan Chapter 3. *(A copy of the Administrative Plan Review is attached.)*

Commissioner Suzanne Stroud motioned to approve the proposed changes for Chapter 3 of the Administrative Plan. Commissioner Janice Craddieth seconded. Eight (8) in favor. Motion passed.

c) Administrative Plan Chapter 7 Summary

Hodgson summarized the proposed changes in Administrative Plan Chapter 7.

Commissioner Craddieth motioned to approve the proposed changes for Chapter 7 of the Administrative Plan. Commissioner Eudaley seconded. Nine (9) in favor. Motion passed.

d) Administrative Plan Chapter 8 Summary

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Hodgson summarized the proposed changes in Administrative Plan Chapter 8. She also added she met with Ben Pothoff, Housing Inspection Supervisor, for guidance with updating and clarifying information in this chapter.

Commissioner Stroud motioned to approve the proposed changes for Chapter 8 of the Administrative Plan. Commission Coralita Shumaker seconded. Nine (9) in favor. Motion passed.

e) Administrative Plan Chapter 9 Summary

Hodgson discussed the proposed changes in Administrative Plan Chapter 9.

Commissioner Stroud motioned to approve the proposed changes for Chapter 9 of the Administrative Plan. Commission Craddieth seconded. Nine (9) in favor. Motion passed.

f) Administrative Plan Chapter 10 Summary

Hodgson explained the proposed changes in Administrative Plan Chapter 10.

Commissioner Craddieth motioned to approve the proposed changes for Chapter 10 of the Administrative Plan. Commission Eudaley seconded. Nine (9) in favor. Motion passed.

g) Administrative Plan Chapter 11 Summary

Hodgson summarized the proposed changes in Administrative Plan Chapter 11.

Commissioner Craddieth motioned to approve the proposed changes for Chapter 11 of the Administrative Plan. Commission Hilary Dalton seconded. Nine (9) in favor. Motion passed.

h) Administrative Plan Chapter 12 Summary

The proposed changes in Administrative Plan Chapter 12 were summarized by Hodgson.

Commissioner Eudaley motioned to approve the proposed changes for Chapter 12 of the Administrative Plan. Commission Shumaker seconded. Nine (9) in favor. Motion passed.

Reports

a) Community Development Advisory Commission Report

Commissioner Craddieth stated the Community Development Advisory Commission reviewed and approved large neighborhood grants. They received information about a new short-term rental/mortgage assistance program for those who were working in January 2020.

Alexis Steger, Department Director, added the applications will be accepted for the short-term rental/mortgage assistance while funding is available and landlords may refuse to accept funding from this source of income. Steger will forward a link to information and the application for this program to the Housing Commissioners.

b) Rehab Report

Kris Neyen, Rehabilitation Programs Supervisor, reported the sale of 396 Locust Street is pending. 2407 Queen Street and 2243 Central Avenue are being finalized for an appraisal. Neyen will be hosting her first virtual home workshop on Monday.

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c) Neighborhood Services

Jerelynn O'Connor, Neighborhood Development Specialist, reported seven (7) large neighborhood grants were approved. O'Connor stated many neighborhood group are not meeting in person due to COVID-19; many are utilizing social media.

d) Assisted Housing Waiting List Statistical Summary

Cate Richter, Assisted Housing Coordinator, reported there are no applicants on the Housing Choice Voucher (HCV) Waiting List for all applicants have been pulled from it.

e) Housing Choice Voucher Participant Statistical Summary

Richter stated she was experiencing computer issues; therefore, the Participant Statistical Summary was provided. She will submit a report for April and May at the next regular Housing Commission Meeting.

f) Denial/Termination Meeting Results

Richter reported there was no update.

g) Equitable Poverty Prevention Plan Update

Steger reported traditional meetings could not be held due to COVID-19; work is being completed to change the outreach plan.

h) Continuum of Care Special Needs Assistance Program

Amanda Hohmann, Regional Homeless Coordinator with East Central Development Corporation, explained the Continuum of Care Special Needs Assistance Program is at 13 households. Hohmann stated they just received the new contract. At this time, they are not sure if funding will be available to add new households to the program. A few households have expressed interest in moving to different units; the deposits for the new units will come out of the funding.

Information Sharing

- a) Saint Stephen's has planned a Drive-thru Food Pantry for Saturday, May 30, 2020

Adjournment

There being no further business to come before the Commission, Commissioner Eudaley moved to adjourn the meeting. Commissioner Craddieth seconded. Motion passed by voice vote. Meeting adjourned at 5:25 p.m.

Minutes taken by:


Tonya England
Recording Secretary

Respectfully Submitted:


Gina Hodgson, Assisted Housing Supervisor

Housing & Community Development Department

Public Housing Authority

Administrative Plan Review

Spring 2020

Proposed Changes – Chapter 1 Overview

- Mission statement more concise
The PHA's mission is to provide decent, safe, and affordable rental housing and to provide opportunities that promote self-sufficiency, economic independence and homeownership opportunities for eligible participants.
- Removal of VCA requirements no longer in effect, such as noting that we will not decrease the size of the program without HUDs approval.
- Removal of Ordinance Language for the Commission and the Federal Regulations from Chapter 403A, to reduce the size and frequency of which the admin plan will need to be updated. All are still referenced and apply.
- Removal of all the history of switching from Housing Commission governing the program to City Council. Old information and cumbersome.

Proposed Changes- Chapter 2 Fair Housing and Equal Opportunity

- Intro
 - Removing information specific to Alvin Nash within the VCA explanation
 - Updating Outreach Method and Rationale with current demographics
- 2-11.A. Overview

- Requests for reasonable accommodations will be reviewed by housing staff, instead of one designated staff person.
- 2-11.C. Request for An Accommodation
 - Change timeframe for decisions to be made on accommodation requests from 20 days to 10 days.
 - Suggested wording: *Whenever possible, reasonable accommodation decisions will be made within 10 business days of the receipt or request or necessary verifications.*
- 2-IV.D PHA Staff Training
 - Remove the VCA required trainings when the obligation has ended.
- Exhibit 2-2: Marketing Outreach Resources
 - Update resources listing with current organizations and contact information to include Resources Unite, Fountain of Youth, Dream Center, etc.
- Remove programs no longer serving our community.

Proposed Changes – Chapter 3 Eligibility

- Adopt all 6-19 Model Admin Plan language
- Removal of Displaced Family full definition, by recommendation of Nan McKay Admin Plan Guide – remove change – mistake not in this section.

3-I.J GUESTS [24 CFR 5.100] Original PHA policy stated: “A guest can remain in the assisted unit no longer than 15 consecutive days or a total of 30 cumulative calendar days during any 12-month period. **With landlord permission and notification to the PHA, guests may be allowed to stay up to 90 cumulative days in a 12-month period. Requests should be made in writing when possible and approved by the PHA prior to the individual moving into the unit.**” – We changed it to read the following: “A guest can remain in the assisted unit no longer than 15 consecutive days or a total of 30 cumulative calendar days during any 12-month period.” Removed the above in yellow.
- Include remaining family member, otherwise eligible to take over as head of household, must be 18 yrs or older
- Removal of duplicate language on recertification of live-in aids
- Adding definition of vulnerable youth: an individual who meets the U.S. Department of Education’s definition of independent student in paragraphs (b), (c), or (h), as adopted in Section II of FR Notice 9/21/16:
- Definition of Vulnerable Youth expanded based on Nan McKay direction to include the following statement: The individual is an orphan, in foster care, or a

ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older

- Removal of requirement to have Circles/FSS staff review files before denial of assistance
- Add ineligibility timeframes for participants with serious program violations
 - Any family member has committed any serious program violations such as having an unauthorized person residing in the household or failed to report income within the last three years.
- Removal of denial period for those who have committed fraud/bribery
- Removal of PIH Notice for Screening Eligibility per model
- Removal of Sex Offender website
- Removal of restrictive timeframes for notifications of decisions (10 days) to allow for circumstances out of PHA control – replaced with “PHA will promptly notify”...
- Removal of biennial reporting due to VCA, as lifted by HUD

Proposed Changes – **Chapter 4 Applications, Waiting List and Tenant Selection**

- Remove requirement to notify applicants if they do not win the lottery for the HCV waitlist
- Removal of outdated wording on methods of receiving applications
- Add methods of contact when an incomplete application is received (phone or e-mail)
- Remove requirement to update all waitlist annually
 - Add “update all waitlists as needed”
- Include *Random Selection Process* to Selection Methods
- Remove date and time selection criteria in Selection Methods
- 4-III.C. Local Preferences – added below bullets to our PHA policy:
 - The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.
 - When an emergency is declared that restricts movement of residents, the PHA may provide preference to applicants living within the City of Dubuque or other local area defined by the emergency restriction areas to ensure residents’ ability to avoid homelessness. As soon as the emergency declaration has expired this local preference will no longer be applicable.
- Add notification of selection by phone, email, first-class mail, or additional contact person
 - If unable to reach family using all methods listed above, family will be removed from waitlist
- Removal of duplicate definitions in Application Interviews

Proposed Changes – **Chapter 5 Briefings**

- Adopt all 6-19 Model Admin Plan language
- Add option for verbal agreements between PHA and landlord when approving the addition of an adult member to assisted household
- Remove 10-day requirement for determinations to allow additional time as needed
- Remove additional PHA Policy in Terminations and Extensions, as new adopted model covers this in detail
- Change initial voucher issuance time from 60 days to 90 days
- Remove restrictive response and determination timeframes
 - Add “will promptly advise of decision/determination”
- Change maximum voucher issuance days to 180 days

Proposed Changes – **Chapter 6 Plan Income**

- Adopt all 6-19 Model Admin Plan language
- Remove additional PHA Policy in *Calculation of Disallowance*. Clarification and definitions provided in adopted model
- Add 50% income exclusion for the second 12-month period of Earned Income Disallowance (24-month term)
- Add required income changes processed following the first 12 months of Earned Income Disallowance period
- Add PHA Policy to all sections regarding minimum rents and financial hardships that we don’t have a minimum rent option
- Add Determination of Hardship definitions
- 6-III.C. Changes in Payment Standards – Decreases – added below paragraph to our PHA policy:
 - Should the Payment Standards decrease by 10% or more during the term of a HAP contract the PHA will provide a 12 month notice of decrease at the next annual re-exam.

Proposed Changes – **Chapter 7 Verification**

- Adopt all 6-19 Model Admin Plan language
- Introduction PHA Policy (pg. 7-1):
 - Remove: *Assistance shall be provided to a family that is limited by disability or the family does not possess the ability (LEP, illiterate)* – No PHA Policy needed in introduction because it is covered in the model statement already.
- 7-I.B. Overview of Verification Requirements (pg. 7-3)
 - Remove: PHA Policy – Forms of verification listed are now part of Model language, no policy needed because it would be duplicative.
- 7-I.C. Up-Front Income Verification (UIV)
 - EIV Income Reports (pg. 7-5 & 7-6)

- Adding to current PHA Policy model language to include Income Verification Tool (IVT) used for verification of income discrepancies.
- Upfront Income Verification Using Non-HUD Systems (pg. 7-7)
 - Add: Verify Advantage & Verify Fast as additional UIV resources currently used by PHA.
- 7-I.D. Third-Party Written and Oral Verification
 - Imputed Assets (pg. 7-10)
 - Add: Value of Assets and Asset Income [24 CFR 982.516] – adopting model language with PHA Policy to include explanation of how to handle family net assets of \$5,000 or less. This detail explains that a self-certification is acceptable, but a third-party verification will be completed.
- 7-I.E. Self-Certification
 - Family Declaration of Assets under \$5,000 (pg. 7-12)
 - Remove section Repetitive; The old admin plan language goes into too much detail about how to third-party verify assets. Model language is adopted that covers this more succinctly.
- 7-II.B. Social Security Numbers
 - PHA Policy (pg. 7-14)
 - Remove - Note to PHA staff with guidance regarding how to determine amount of time PHA will allow applicant or participant to provide SSN documentation. This note is only guidance to assist PHA staff in defining their own policy and does not belong in an admin plan.
 - Remove: Explanations of 24CFR 5.216(h)(2) & Notice PIH 2012-10 – any reference to a specific CFR or PIH Notices are still used, but language from the legislation is not copied into the admin plan, since it can be changed.
 - PHA Policy (pg. 7-16)
 - Replace current PHA Policy with the following language to align with current PHA procedures, including being a resource for families to easily obtain copies of SSN documentation for other benefits:

Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will retain copies of documentation in tenant file. Notice: PIH 2018-24

Old admin plan states PHA would remove and destroy documents with Social Security Numbers on them.

- 7-II.C. Documentation of Age (pg. 7-17)
 - Explanation of 24 CFR 982.516(a)(2)(iv)- reference to specific CFR is still used, but language from the legislation is not copied into the admin plan, since it can be changed.
 - PHA Policy – Remove self-certification requirement if other documentation of age is used (not birth certificate); documentation alone is sufficient.
- 7-II.D. Family Relationships
 - PHA Policy (pg. 7-18)
 - PHA may **not** require written documentation by physician or other recognized agency for verification of pregnancy. Only self-certification is needed. Old Admin plan requires it so that language must be removed. Replace current wording with the following:
Written or verbal self-certification by Head of Household is sufficient verification of pregnancy.
 - Marriage PHA Policy (pg. 7-17)
 - Remove additional wording to simplify requirements for certification. Examples removed due to inability to list all possible situations.
 - Separation or Divorce PHA Policy (pg. 7-18)
 - Remove additional wording that doesn't provide any guidance, it just makes the admin plan longer.
 - Absence of Adult Member PHA Policy (pg. 7-18)
 - Remove additional wording that doesn't provide any guidance, it just makes the admin plan longer.
 - Foster Children and Foster Adults PHA Policy (pg. 7-18)
 - Remove additional wording that doesn't provide any guidance, it just makes the admin plan longer.
- 7-II.H. Verification of Preference Status
 - PHA Policy (pg. 7-24)
 - Replace Policy with the following, as updated in 4-II.C. Local Preferences (provide COVID and other type emergency ability to have a local preference temporarily):

The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The PHA will verify this preference using the PHA's termination records.

When an emergency is declared that restricts movement of residents, the PHA may provide preference to applicants living within the City of Dubuque or other local area defined by the emergency restriction areas to ensure residents' ability to avoid

homelessness. As soon as the emergency declaration has expired this local preference will no longer be applicable.

Proposed Changes – Chapter 8 Housing Quality Standards and Reasonableness Determinations

- Adopt all 6-19 Model Admin Plan language
- 8-I.A. General HUD Requirements
 - Modifications to Provide Accessibility PHA Policy (pg. 8-4)- Remove
 - Remove “note” type wording that doesn’t change policy.
- 8-I.B. Additional Local Requirements
 - PHA Policy (pg. 8-5)
 - Replace Residential Housing Code and City of Dubuque Housing code with:

Property Maintenance Code of the City of Dubuque

- Remove explanation of specific forms used for inspections, because these can always change, not policy related.
- Replace wording for failed and inconclusive items to be more understandable and will now read as follows (no policy changes):

In the case of any failed inspection, inspection results will be sent to both the owner and the tenant and will list any deficiencies. Units with failed inspections will have a re-inspection completed prior to approval of any payments or within the PHA specified timeframe.

- Replace “licensed under the Dubuque Housing Code” with the following:

Only units with current rental licenses issued in accordance with the Property Maintenance Code of the City of Dubuque will be acceptable.

- Grammar updated and specific references to the Board updated to reflect actual board name.
- Replace all “Housing Code” and all irrelevant code references with the following guidance so admin plan is always consistent with new code adopted by the City of Dubuque:

International Property Maintenance Code, herein referred to as the Property Maintenance Code of the City of Dubuque.

- 8-I.C. Life-Threatening Conditions
 - PHA Policy (pg. 8-7)
 - Replace current PHA Policy referring to life threatening conditions, to reflect the adopted property maintenance code for the City of Dubuque.
- 8-I.D. Owner and Family Responsibilities
 - PHA Policy (pg.8-8)
 - Updated with new IPMC code.
 - Family Responsibilities PHA Policy (pg. 8-8)
 - Replace all instances of the word *Shall* with *May* because it is not a requirement but an option for enforcement.
 - Owner Responsibilities PHA Policy (pg. 8-9)- Remove
 - Remove entire PHA Policy, as information is addressed with newly adopted Model language.
- 8-II.A. Overview
 - Types of Inspections PHA Policy (pg. 8-10)
 - Remove PHA Policy, as all information is addressed in other subsections.
 - Remove Inspection of PHA-Owned Units, we don't own units (pg. 8-12)
 - Inspection Costs PHA Policy (pg.8-12)
 - Replace current policy to the following to reduce repetition:

The PHA will not charge a fee for failed re-inspections.
 - Notice and Scheduling PHA Policy (pg. 8-13)
 - Replace Owner/Family with *Landlord/Tenant*
 - Owner and Family Inspection Attendance PHA Policy (pg. 8-13)
 - Replace current policy with the following, as all other information is addressed is 8-II.D.:

An adult must be present for all inspections.
- 8-II.B. Initial HQS Inspection
 - PHA Policy (pg. 8-14)
 - Replace current policy with the following, to be consistent with current procedures.
 - Initial Inspection Results and Reinspection's PHA Policy (pg.8-14)
 - Replace current policy with the following to be consistent with current procedures and include weather related extensions:

Initial Inspections must be completed, passed, and have no outstanding licensing fees due before granting final approval of the selected dwelling unit and prior to approval of any payments.

A request for Appeal or Modification to the Code shall be allowed as follows:

For exterior repairs, if the owner has proof of materials on order or repairs to be completed under contract and the interior of the unit is code-compliant, the unit will not be delayed from going on the program, pending appeal for a time extension. Proof of orders and contracts should be included with the appeal request. Weather-related extensions will also be considered.

Units pending requests for modifications under Section 404 (Occupancy Limitations) of the Property Maintenance Code such as ceiling heights, light and ventilation, room sizes and widths, etc. shall not enter into a HAP Contract until the modification has been approved by the Code Official.

If any HQS violations are identified, the owner and family will be notified of the deficiencies and the owner will be given a time frame (normally 30 days) to correct them.

If the time period for correcting the deficiencies (or any PHA-approved extension) has elapsed, or the unit fails at the time of the reinspection, the PHA will notify the owner and the family that the unit has been rejected and that the family must search for another unit. The PHA may agree to conduct subsequent reinspection's, for good cause, at the request of the family and owner.

Following a failed reinspection, the family may submit a new Request for Tenancy Approval after the owner has made repairs, if they are unable to locate another suitable unit.

- 8-II.D. Special Inspections
 - PHA Policy (pg. 8-16)
 - Remove entire policy, as special inspections are addressed in previous sections with almost exact verbiage as current plan.
- 8-II.F. Inspection Results and Reinspection's for Units Under HAP Contract
 - PHA Policy (pg.8-18)
 - Remove Facsimile from forms of notification, only phone, email or letter are used.
 - Remove 30-day timeframe for written notice.

- Extensions PHA Policy (pg.8-19)
 - Replace Appeals Board with:

Housing Board of Appeals

- 8-II.G. Enforcing Owner Compliance
 - HAP Contract Termination PHA Policy (pg.8-21)
 - Remove all information regarding life-Threatening Conditions, as these are address in 8.I.C.

Proposed Changes – **Chapter 9 General Leasing Policies**

- Adopt all 6-19 Model Admin Plan language
- 9-I.B. Requesting Tenancy Approval
 - PHA Policy (Pg. 9-3 & 9-4)
 - Add: Include e-mail as an acceptable means for updating missing information/documents and corrections terms of RTA or lease.
- 9-I.E. Lease and Tenancy Addendum
 - PHA Review of Lease PHA Policy (pg. 9-11)
 - Replace: The regulations do not require the PHA to review the lease to determine if the lease complies with State and local law. Due to staffing and potential liability, replace policy with the following:

The PHA will not review the owner's lease for compliance with state/local law.

- 9-I.F. Tenancy Approval
 - PHA Policy (pg. 9-12)
 - Replace restrictive 10 business day timeframe for determination with the following:
- 9-I.H. Changes in Lease or Rent
 - PHA Policy (pg. 9-14)
 - Replace 1st paragraph of policy with the following to remove restrictive timeframes for determination of rent increases:

Where the owner is requesting a rent increase, the PHA will promptly determine whether the requested increase is reasonable. The owner will be notified of the determination in writing if the request is denied, the amount of increase is less than requested, or effective date is not correct.

Proposed Changes – **Chapter 10 Moving with Continued Assistance and Portability**

- Adopt all 6-19 Model Admin Plan language
- 10-I.A. Allowable Moves
 - PHA Policy (pg. 10-1)
 - Remove entire PHA Policy, as additional guidance is not needed in this section.
- 10-I.C. Moving Process
 - Approval PHA Policy (pg. 10-5)
 - Replace restrictive 10 business day timeframe for notification of approval with the following:

Upon receipt of a family's notification that it wishes to move, the PHA will determine whether the move is approvable in accordance with the regulations and policies set forth in sections 10-I.A and 10-I.B. The PHA will promptly notify the family in writing of its determination.

- Voucher Issuance and Briefing PHA Policy (pg. 10-5)
 - Replace restrictive 10 business day timeframe for issuance of a voucher with the following:
For families approved to move to a new unit within the PHA's jurisdiction, the PHA will promptly issue a new voucher.
 - Zero HAP Families Who Wish to Move PHA Policy (Pg. 10-6)
 - Add the following PHA Policy, adopted with new model language:
If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit to which the family requests to move, the PHA will not enter into a HAP contract on behalf of the family for the new unit.
- 10-II.B. Initial PHA Role
 - Voucher Issuance and Term PHA Policy (pg. 10-12)
 - Change initial voucher term from 60 days to 90 days
 - Voucher Extensions and Expiration PHA Policy (pg. 10-13)- Add
 - Add the following language to place a cap on the maximum number of days for an extension:

However, 180 days will be the maximum amount of time granted on a voucher.
 - Sending Documentation to the Receiving PHA Policy (pg. 10-15)
 - Remove part of policy advising PHA will notify family in writing of any information provided to receiving PHA. Current procedure is written notification to family that file has been sent to receiving

PHA and direction for tenant to contact receiving PHA to follow-up.

Proposed Changes – **Chapter 11 Reexaminations**

- Adopt all 6-19 Model Admin Plan language
- 11-I.B. Scheduling Annual Reexaminations
 - PHA Policy (pg.11-2)
 - Replace *The first annual recertification and any recertification for families reporting zero income must be a face-to-face interview* with the following. We don't currently conduct face-to-face interviews for zero income families nor would current workload allow time to do so; also allow for video interviews:

The first annual recertification must be an interview either in person or via technology.

- PHA Policy (pg. 11-3)
 - Remove requirement to have Zero Income families meet with FSS Coordinators during annual reexaminations. Workload and scheduling does not allow for the coordination of this with every zero income family, families are referred to FSS Coordinators by Housing Specialists at any time.
- Notification of and Participation in the Annual Reexamination Process PHA Policy (pg.11-3)
 - Add in-person or via technology for annual reexamination Interviews to allow alternative communication.
 - Remove requirement for families to meet with FSS Coordinators at annual reexamination. Families are referred to FSS Coordinators by Housing Specialists at any time.
 - Remove requirement for families with documented history of not reporting correctly, prior family obligation violations or with zero income to have in-person interview. Specialist do not currently require in-person interviews for these reasons.
 - Add e-mail as means for accepting documents.
- 11-I.D. Determining Ongoing Eligibility of Certain Students
 - PHA Policy (pg.11-6)
 - Add Vulnerable Youth to students whose parents' income will not be reviewed. Addition was also made to previous chapters to include this population of youth.
- 11-II.B. Changes in Family and Household Composition
 - New Family and Household Members Requiring Approval PHA Policy (pg.11-9)

- Add *Promptly* as expectation for providing written approval to family.
- Replace restrictive 10 business day timeframe for determination to the following:

The PHA will promptly make its determination after receiving all information required to verify the individual's eligibility.

Proposed Changes – **Chapter 12 Termination of Assistance and Tenancy**

- 12-I.C. Family Chooses to Terminate Assistance
 - PHA Policy (pg. 12-2)
 - Remove Note and update policy to the following:
- The request to terminate assistance should be made in writing and signed by the head of household, and spouse or co-head if applicable. However, often times the requests are made by voice mail or by telephone. Staff will request confirmation in writing or by e-mail but will follow the notice requirements in Section 12-II-F based upon verbal communications. In all cases and before terminating the family's assistance, the PHA will follow the notice requirements in Section 12-II.F. Informal hearings are not obligated and shall not be provided.*
- 12-I.E. Mandatory Policies and Other Authorized Terminations
 - Drug-Related and Violent Criminal Activity PHA Policy (pg.12-7)
 - Add the following to criminal activities that may be cause for termination on a case-by-case basis:

17) Federal Weapons Offenses

18) Human Trafficking

19) Gun Trafficking

- 12-II.D. Criteria for Deciding to Terminate Assistance
 - Consideration of Circumstances PHA Policy (pg.12-12)
 - Update staff present for review to the following, as we no longer have Circle Initiative Program:

When considering the circumstances and reviewing alternative choices to termination of assistance, the Assisted Housing Coordinator, Assisted Housing Specialists and Gaining Opportunities staff will meet to make the

decision prior to proposal of termination to consider whether there are other alternatives that can be presented.

- Add in factors being considered when making a decision to terminate the following:

The length of time since the violation occurred, including the age of the individual at the time of the conduct, the family's recent history and the likelihood of favorable conduct in the future.

- 12-II.F. Termination Notice PHA Policy (pg.12-16 & 12-17)- Combine
 - Combine PHA Policies with no change and place after model language.