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Resolution to Amend the Administrative Plan Regarding Family Self-Sufficiency, Medical Deductions, Additions to the Family, and the PBV Program

The Ann Arbor Housing Commission's Housing Choice Voucher Administrative Plan details its policies and procedures for the management of its Housing Choice Voucher (HCV) Program. The AAHC periodically revises the Plan to reflect changes in HUD policies and changes in AAHC policies.

The AAHC is proposing 9 changes to the Administrative Plan.

- 1) The first is to change the policy regarding the FSS program Basic Requirements because the current language within this policy identifies agencies that recently changed their name or the agency/program is disbanded. This recommendation changes the agency name DHS to DHHS, Work First to Michigan Works, and removes the Women's Center of America.

The current language:

In implementing the FSS program, the PHA will work with human service s agencies including the Family Independence Agency/Department of Human Services, Work First, The Women's Center of America, and others that through outreach are willing to partner in this endeavor. In addition, the PHA will secure partnerships with local universities, the banking industry and local businesses.

The proposed replacement language:

In implementing the FSS program, the PHA will work with area human service agencies, such as the Department of Health and Human Services, Michigan Works, and others that through outreach are willing to collaborate in this endeavor. In addition, the PHA will leverage resources from local education institutions, nonprofit organizations, and employers.

- 2) The second is to change the policy regarding FSS Family Demographics. The current

language within this policy is outdated and doesn't represent the agencies current relationships and demographics. For example, there is no longer a program called Welfare-to-Work and the demographics were updated.

The current language:

The PHA serves the low-income population of southeastern Michigan through its public housing and Section 8 programs. Most of the applicants for public housing are drawn from the local Ann Arbor and Ypsilanti areas; however, applicants for Section 8 are drawn from a wider area encompassing Washtenaw, and Oakland counties. Families participating in Ann Arbor's FSS program are expected to come primarily from the agency's Section 8 Welfare-to-Work program, although families from the regular Section 8 programs will be encouraged to participate as well.

Effective May 1, 2015; AAHC will no longer service Wayne County.

Demographics of the 206 participating families in our Welfare to Work program are (as of June 5, 2002):

Black Female Head of Household	162
White Female Head of Household	42
Hispanic	4
Non-Hispanic	202
Average number of persons per household	3
Number of families employed	142
Number of families receiving social security benefits	16
Number of families receiving welfare benefits	64
Average Annual Income	\$12,705

Based on our discussions with participants of these programs, we anticipate the needs of the program to include: Employment counseling, job training, job development and placement, assistance in managing personal finances, access to affordable transportation, training in parenting and general support and guidance.

The proposed replacement language:

The PHA serves the low-income population of southeastern Michigan through its RAD Project Based Voucher (PBV) and Housing Choice Voucher programs. Most of the applicants are drawn from the local Ann Arbor and Ypsilanti areas; however, applicants for Housing Choice Voucher program are drawn from a wider area encompassing Washtenaw, and Monroe counties. Families participating in Ann Arbor's FSS program are expected to come primarily from the agency's Housing Choice Voucher programs, although the agencies RAD PBV families will be encouraged to participate as well.

Effective May 1, 2015; AAHC no longer services Wayne County.

Demographics of the Voucher programs are (as of March 1, 2018):

Black/African American Only	996
White Only	519

American Indian or Alaska Native Only	5
Asian Only	7
Native Hawaiian/Other Pacific Islander Only	2
Any Other Combination	10
Average number of persons per household	2
No Income	119
Other Income	127
SS/SSI/Pensions	842
Wages	445
Welfare	6
Average Annual Income	\$13,825

Based on our analysis of these demographics, we anticipate the needs of the program to include; employment counseling, job training, job development and placement, assistance in managing personal finances, access to affordable transportation, training general support, guidance, and may include parenting classes.

- 3) The third change is regarding FSS incentives to encourage participation. The current language within this policy doesn't represent the agencies current activities. The following recommending brings the PHA in line with its current activity and recruitment efforts.

The current language:

In addition to making referrals for services, advocacy and or training, the PHA's FSS program will develop a participant forum to share ideas, concerns, assist in shaping programming as well as providing peer-to-peer support. This forum is unique to the PHA's programs and provides a nurturing environment that will acknowledge and celebrate individual and group successes.

The proposed replacement language:

In addition to making referrals for services, advocacy and or training, the PHA's FSS program will use the PHA's Resident Advisory Board during development of the PHA's annual plan as a participant forum. This forum is unique to the PHA's programs and provides a nurturing environment participants can share ideas, concerns, assist in shaping programming as well as providing peer-to-peer support.

- 4) The fourth is change the policy regarding FSS Outreach. The current language within this policy doesn't represent the agencies current activities. The following recommending brings the PHA in line with its current activity and recruitment efforts.

The current language:

All current participants of the PHA's Section 8 programs will receive a letter briefly describing the Family Self-Sufficiency Program along with an invitation to attend an information session at the

agency or a nearby facility. At the orientation session, interested persons will be educated about the program by PHA staff and guest speakers. Those who wish to participate in the program will be asked to sign their names on an interest list at the end of orientation

A similar orientation summary will be provided at each briefing (for applicants off the waiting list who are receiving their rental assistance voucher), encouraging new Section 8 Voucher holders to participate in FSS.

The proposed replacement language:

An orientation summary will be provided at each briefing (for applicants off the waiting list who are receiving their rental assistance voucher), encouraging new Section 8 Voucher holders to participate in FSS.

Interested persons will be invited to an individual orientation and educated about the program by PHA staff. Those who wish to participate in the program will be asked to complete a contract of participation or sign their names on an interest list, if no slots are available.

- 5) The fifth is to change the policy regarding adding a family member to a household. Staff recommend this change in policy to help make the process of adding a family member more efficient. The current policy has caused issues because paperwork has to essentially be “held” until the annual. This is an opportunity for paperwork to be lost or misplaced especially when there is a turn-over in staff. It also causes issues with the income of the family. If the head of household is a zero income person, they have to certify that they are \$0 income every 90 days. When another person is added to the household that has income, they are not a \$0 income family any longer and cannot fill out a \$0 income certification. If we do not add that family member with income to the household, it makes it impossible to \$0 income certify that family.

The current language:

The PHA will not conduct interim reexamination to add a new family member, live-in aide, foster child, or foster adult; including new members under the age of 6. A full reexamination of income and household composition will be conducted at the family’s annual reexamination.

The proposed replacement language:

The PHA will conduct interim reexaminations to add a new family member, live-in aide, foster child, or foster adult; including new members under the age of 6. The income of the new member will be conducted and included in the interim reexamination.

- 6) The sixth is to change the policy regarding medical expenses. Staff recommend adoption of this language to clarify the policies for residents as well as allow prescribed over the counter medications to be allowable deductions.

The current language:

The most current IRS Publication 502, Medical and Dental Expenses, will be used to as a reference to determine the costs that qualify as medical expenses.

The proposed replacement language:

Medical expenses include, but are not limited to: services of physicians and other health care professionals, services of health care facilities, health insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, and payments on accumulated medical bills. Nonprescription medicines (over the counter purchases) must be doctor-prescribed in order to be considered a medical expense. The expenses claimed must be verifiable in order to be considered by the PHA for the purpose of determining a deduction from income.

When it is unclear in the HUD rules as to whether or not to allow an item as a medical expense, IRS Publication 502 will be used as a guide.

- 7) The seventh is to add a new policy regarding offering a voucher to an applicant on the PBV waitlist. Staff recommend adoption of this language to clarify the policy and add a procedure for applicants who either refuse units offered to them or who do not respond in a timely manner when units are offered to them. When this happens the units can stay vacant for an excessive amount of time and the AAHC is unable to fill the unit with another applicant. This process will enable the AAHC to offer a vacant unit to another applicant on the waitlist in a timely manner.

The current regulation:

Refusal of Offer [24 CFR 983.251(e)(3)]

The PHA is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refuse to list the applicant on the waiting list for tenant-based voucher assistance;
- Deny any admission preference for which the applicant qualifies;
- Change the applicant's place on the tenant-based waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA's selection policy;
- Remove the applicant from the tenant-based voucher waiting list.

The proposed new policy:

- Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer. Offers made by telephone will be confirmed by letter.
- The applicant will first be offered the appropriate unit that has been vacant the longest. If the offer is rejected, a final offer will be made for the next available unit based on length of time vacant.
- The offers will normally be made in sequence, however, if two units are available, the

two appropriate units that have been vacant the longest may be shown and the applicant allowed to choose between the two.

- If a family refuses an offer of PBV assistance, the family will only be removed from the PBV waitlist from which the family is pulled. The family will not be removed from any other waitlists.

- 8) The eighth is to add a new policy regarding when the PBV Owner's selects a tenant and notifies the PHA. Staff recommend adoption of the language to create a policy that requires owner to notify the PHA within 30 days if the applicant has been approved or denied by the PBV Owner so that a new tenant can be referred to the Owner.

The current regulation in the PBV chapter:

17-VI.F. OWNER SELECTION OF TENANTS

The owner is responsible for developing written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to fulfill their obligations under the lease. An owner must promptly notify in writing any rejected applicant of the grounds for any rejection [24 CFR 983.253(a)(2) and (a)(3)].

The proposed new policy:

The PHA will make every reasonable effort to refer families to the owner within 10 business days of receiving notice of vacancy from the owner. The owner must notify the PHA in writing, within 30 days of receiving the referral, whether the family has been accepted or rejected including the grounds for rejection.

- 9) The ninth is to change the policy regarding a PBV family's right to apply for a tenant-based voucher (TBV) and returning to the wait list. Staff recommend adoption of this language to clarify the policy and add streamlined procedures for tenants who request tenant based assistance after one year of tenancy in project based voucher housing.

The current regulation in the PBV chapter:

Family Right to Move [24 CFR 983.260]

The family may terminate the lease at any time after the first year of occupancy. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to the PHA. If the family wishes to move with continued tenant-based assistance, the family must contact the PHA to request the rental assistance prior to providing notice to terminate the lease.

If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance.

If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.

The proposed new policy:

Approval

PHA Policy

Families that wish to move with continued tenant-based assistance must request a tenant based voucher in writing. The family will be placed on a waiting list. Families will be selected from the waiting list and selected by date and time that the request was received.

Once the family is selected from the waitlist, 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 notify the family in writing of its determination within 10 business days following receipt of the family's notification.

Reexamination of Family Income and Composition

PHA Policy

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will perform a new annual reexamination if it is required, in accordance with the policies set forth in Chapter 11 of this plan.

For families moving into or families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in Chapter 10.

Voucher Issuance and Briefing

PHA Policy

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will issue a new voucher within 10 business days of the PHA's written approval to move. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration.

If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued project-based voucher assistance.

If the family fails to lease up a new unit and the voucher expires, the family must wait one year from the time the voucher was issued before requesting placement on the PBV to HCV waitlist again.

For families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in chapter 10.

AAHC staff recommend approval of the policies listed above.

Prepared by Misty Hendershot, Voucher Manager & Weneshia Brand, Director of Operations

Approved by Jennifer Hall, Executive Director

WHEREAS, The Ann Arbor Housing Commission's Housing Choice Voucher Administrative Plan details its policies and procedures for the management of its Housing Choice Voucher (HCV) Program; and

WHEREAS, the policy language regarding the FSS program, adding interim family members, medical expense deductions, and the PBV program;

RESOLVED, that the Board of the Ann Arbor Housing Commission approve these revisions as described in the memorandum above, to the Administrative Plan to take effect on July 18, 2018.