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Resolution to Amend the Administrative Plan Regarding Waiting List, Tenant Selection, Income, Verifications, and Reexaminations

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. Staff recommend that the AAHC Board adopt policy changes that impact the occupancy standard to increase the housing opportunities and housing stability for AAHC voucher families. The proposed changes are within the following sections: Chapter 4 Applications, Waiting List and Tenant Selection, Chapter 6 Income and Subsidy Determinations, Chapter 7 Verification, and Chapter 11 Reexaminations

**Proposal 1:**

AAHC is proposing to change the current policy regarding the waiting list application submission process to match the online application operating system functionality. The proposal also adds language to clarify that a family may only submit one application during the opening application period.

**4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 - 4-16, Notice PIH 2009-36]**

**The proposed policy language is:**

PHA Policy

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to

determine the family's placement on the waiting list.

Families must submit a pre-application to the PHA on-line. The PHA will not verify any information provided on the pre-application. As a reasonable accommodation to applicants with a disability, the PHA will accept applications via telephone during normal business hours or in person.

Pre-applications must be complete to be accepted by the PHA for processing. If a pre-application is incomplete, the online system will reject the pre-application and will notify the family the reason the application was rejected. Applicants may correct any information during the open application period. Once the waiting list is closed, changes may not be made during the period the PHA is determining the family's placement on the waiting list.

The PHA will only accept one application per household. If a household is composed of more than 1 adult, each adult may submit an application as an individual household, or multiple adults can be included in one application if all of those adults will reside in the same home. If there are multiple applications with the same adult household member then all applications with that adult household member will be rejected.

For example, a family or household with two adults can either submit one application for both adults, or submit 2 separate applications for each adult. Or a household with 3 adults can submit 1 application with all 3 adults listed, or 3 separate applications with 1 adult listed, or 2 applications with 2 adults listed on one application and 1 adult listed on the 2<sup>nd</sup> application.

**The current language is:**

PHA Policy

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

Applications will only be received through the online application process unless the household is applying through the special waitlists for homeless households or RAD PBV or other PBV eligible tenants. An exception will be made in cases of the need for a reasonable accommodation. Applications must be complete in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.

**Proposal 2:**

Staff recommends the following amendment. Under the current policy, AAHC will place applicants on the waiting list using a first come first served method and random lottery. Language was added to clarify the process and to enable the AAHC to select one method or the other. The AAHC must publish its selection methodology at the time it opens the waitlist.

**Eligible for Placement on the Waiting List**

**The proposed change in policy is:**

PHA Policy

The PHA's online system will provide an automated written notification of the preliminary eligibility verification at the time the pre-application is completed and submitted.

The PHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a complete application as a reasonable accommodation for persons with disability.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA.

The applications will be placed on the waiting list using one of the following methods:

- 1) First Come, First Served Placement Method
- 2) Random Sort/Lottery Placement Method

The PHA will limit the number of applicants to be placed on the waiting list to the estimated number of applicants necessary to fill anticipated openings for one year

**The current language is:**

PHA Policy

The PHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA.

Other applicants will be placed on the waiting list based on lottery selection. AAHC will limit the number of applicants to be placed on the waiting list to the estimated number of applicants necessary to fill anticipated openings for one year

**Proposal 3:**

Staff recommended the following amendments to clarify language in Chapter 4.II.B., C., E., and III.C. In Section B., amended language allows AAHC to have a single waiting list for the AAHC's RAD converted properties and AAHC will maintain a waiting list for PBV properties not owned by the AAHC, at the owner request. In Section C., amended language allows AAHC flexibility in determining an adequate applicant pool when opening the waiting list. In addition, we will continue to receive applications for applicants eligible for targeted funding programs. In Section E., we suggest clarifying that applicants make changes to family composition and contact information using the online system, except as a reasonable accommodation. Staff recommends removing the language regarding purging the waiting list because HUD regulation does not require the PHA to purge the waiting list.

In Section III.C., staff suggest adding language to the Selection Method section to include policy written by HUD PIH Notice 2012-34. In addition, we have removed VAWA as a local preference. VAWA victims are eligible to receive a voucher under the AAHC Emergency Transfer Policy, therefore the preference is no longer needed.

**4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]**

**The proposed change in policy is:**

PHA Policy

The PHA will maintain a single waiting list for the HCV program. The PHA will maintain a single waiting list for the PBV properties owned by the PHA. The PHA may maintain a single waiting list for PBV properties not owned by the PHA at the request of the owner.

**The current language is:**

PHA Policy

The PHA will maintain a single waiting list for the HCV program.

**4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]**

## Closing the Waiting List

### **The proposed change in policy is:**

#### PHA Policy

If the PHA determines that the existing waiting list contains an adequate pool for use of available program funding, the PHA may stop accepting new applications and close the waiting list,

Where the PHA has particular preferences or funding criteria that require a specific category of family such as homeless, FUP, NED, VASH, or PBV, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

### **The current language is:**

The PHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 24 months for the most current applicants. Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

## 4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

### **The proposed change in policy is:**

#### PHA Policy

While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number through the on-line application portal, unless the applicant requests a reasonable accommodation to provide the information in an alternative manner.

### **The current language is:**

#### PHA Policy

While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing. Once the family can make changes online, the changes must be made electronically, except in cases of reasonable accommodation.

## Purging the Waiting List

### **The proposed change in policy is to simply remove the PHA policy regarding purging:**

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a PHA request for information or updates, and the PHA determines that the family did not respond because of the family member's disability, the PHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

### **The current language is:**

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a PHA request for information or updates, and the PHA determines that the family did not respond because of the family member's disability, the PHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

#### PHA Policy

With electronic wait list processing, the PHA will not conduct purges of the waiting lists. Families selected for placement on the waiting list will be notified of their responsibility to update their information on an ongoing basis.

#### 4-III.C. SELECTION METHOD

**The proposed change in policy is:**

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

In cases where the PHA has been awarded funding by HUD for a specified category of families (e.g. NED or FUP vouchers), the PHA does not have to establish a preference for the specified category (**Notice** PIH-2012-34 (HA)).

PHAs may create a preference or limited preference specifically for people who are referred by a partnering homeless service organization or consortia of organizations (for example, an organization that refers people transitioning out of a shelter, transitional housing program, or rapid re-housing program) (**Notice** PIH-2012-34 (HA)).

**The current language is:**

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

#### Local Preferences [24 CFR 982.207; HCV p. 4-16]

**The proposed change in policy is to remove the following preference for VAWA because it is covered under another section:**

PHA Policy

The PHA will use the following local preferences:

2. The PHA will offer a preference to current AAHC families that include victims of domestic violence, dating violence, sexual assault, or stalking who have either been referred by a partnering service agency or consortia or is seeking an emergency transfer under VAWA from the PHA’s public housing program or other covered housing program operated by the PHA. The PHA may work with the following partnering service agencies:

- **SafeHouse Center Domestic Violence and Sexual Assault Project**

The applicant must certify that the abuser will not reside with the applicant unless the PHA gives prior written approval.

#### Order of Selection

**The proposed change in policy is:**

PHA Policy

The PHA will select families from the waiting list based on targeted funding or selection preference(s) for which the family qualifies and in accordance with the PHA’s preference calculation method. For families with the same preference status, the PHA may use either date and time of application; or a random selection technique. The PHA order of selection is as follows:

1. Families who have been issued a voucher and the voucher was rescinded due to insufficient funds are placed at the top of the waiting list and will be admitted when sufficient funds are available.
2. The PHA will leave the waiting list open for the following preferences and special funding categories while keeping it closed for all other applicants:
  - a. Applicants who meet the homeless preference, This enables homeless households to be

referred directly from the local HARA or be referred at the discretion of the Executive Director if the household has been involuntarily displaced.

- b. Applicants who qualify for special categories of targeted funding such as VASH, NED and FUP
  - c. Applicants who are eligible for a tenant-based voucher who are currently in a project-based voucher unit
3. The PHA will pull an equal number of waitlist applicants from the HCV waitlist and the waitlist for PBV/RAD PBV/VASH tenants that are eligible for and requested an HCV.
    - The PHA may not select more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects under the RAD PBV program. [PIH Notice 2012-32 (HA) REV 1]
  4. Applicants who meet the disability and residency preference will be pulled from the waitlist prior to applicants who do not meet those preferences. If there is no one on the waiting list that meets the disability or residency preference criteria, the PHA will pull the next applicant on the waiting list.
  5. Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding for tenant-based vouchers or project-based vouchers or unit-specific features for project-based vouchers. If a higher placed family on the waiting list is not qualified or not interested in targeted funding or unit-specific features, there will be a notation maintained on the applicant's record, so that the PHA does not have to ask higher placed families each time targeted selections are made.

**The current language is:**

PHA Policy

The preference of residency will be worth 2 points and the preference of disabled household member will be worth 1 point in order to determine the regular housing choice voucher waitlist.

The AAHC will rank all applicants based on preferences. The AAHC will randomly select 500 applicants from all applicants with 3 points. If there are fewer than 500 applicants with 3 points, the AAHC will randomly select additional applicants with 2 points so that the total number of selected applicants is 500. If there are fewer than 500 applicants with 2 or 3 points, the AAHC will randomly select additional applicants with 1 or less points so that the total number of selected applicants is 500.

The preference for homeless or involuntarily displaced will not be given a point value because the homeless/displaced waitlist is an open waitlist. This enables homeless households to be referred directly from the local HARA or be referred at the discretion of the Executive Director if the household has been involuntarily displaced.

Families will be selected from the waiting lists based on the targeted funding or selection preference(s) for which they qualify.

Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding for tenant-based vouchers or project-based vouchers or unit-specific features for project-based vouchers. If a higher placed family on the waiting list is not qualified or not interested in targeted funding or unit-specific features, there will be a notation maintained on the applicants record, so that the PHA does not have to ask higher placed families each time targeted selections are made.

As HCV vouchers become available, the AAHC will first fill those voucher slots from voucher tenants who had vouchers terminated due to insufficient funds. Next, the slots will be filled from any commitments to homeless households through the Homeless preference. Finally, the AAHC will pull an equal number of waitlist applicants from the HCV waitlist and the waitlist for PBV/RAD PBV/VASH tenants that are eligible for and requested an HCV.

- The PHA may not select more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects under the RAD PBV program.

The VASH voucher waitlist is administered separately by the VA and VASH vouchers will be provided as VASH vouchers become available.

**Proposal 4:**

This proposal is to bring AAHC policy in line with industry standard. The AAHC no longer requires families to show efforts to collect child support payments; therefore, staff recommends removing this language from the administrative plan.

**6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]**

**Alimony and Child Support**

**The proposed language is:**

PHA Policy

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, or (2) records show that payment are being made irregularly.

**The current language is:**

PHA Policy

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments.

**Proposal 5:**

This proposal is in regards to Chapter 7: Verifications. Families must provide documents to verify the identity and marital status, if applicable. Staff recommends the policy amendment to accept Social Security Administration (SSA) Benefit letters from adults and Hospital Certified Proof of Birth documents for children as proof of identity. In addition, staff recommends the policy amendment to accept certified affidavits for proof of separation and divorce.

Also, staff recommends adopting policy to streamline the verification process for families with business income to provide income tax statements or audited financials as verification of income. Regarding the Social Security policy language, SSA notifies families in late November of COLA increases, this results in a number of errors in tenant rent calculations that are effective in January because the AAHC must complete the re-certifications at least 30 days prior to the effective date. Staff recommends including HUD language to streamline calculating COLA increases of Social Security benefit income for incomplete recertifications effective after January 1st, to reduce tenant rent calculation errors. Lastly, staff recommends removing the language requiring families to provide proof of child support payment enforcement.

**7-II.A. VERIFICATION OF LEGAL IDENTITY**

**The proposed language is:**

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

- A Social Security Administration Benefit Printout for verification of legal identity for adults has been added to the list of acceptable documents.
- Hospital Certified Proof of Birth record for verification of legal identity for children has

been added to the list of acceptable documents..

**The current language is:**

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member. *The two documents listed above where not listed as acceptable forms of documents.*

**Separation or Divorce**

**The proposed language is:**

PHA Policy

The PHA will require the family to provide documentation of the divorce or separation.

If no court document is available to document a separation, an affidavit of separation signed by the applicant or participant, is required to document that a couple is separated.

An affidavit of estrangement, married living apart, signed by the applicant or participant, is required to document that a couple is estranged.

**The current language is:**

PHA Policy

The PHA will require the family to provide documentation of the divorce or separation.

If no court document is available documentation from a community-based agency will be accepted. Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship.

**7-III.B. BUSINESS AND SELF-EMPLOYMENT INCOME**

**The proposed language is:**

PHA Policy

Business owners and self-employed persons will be required to provide:

All schedules completed for filing federal and local taxes in the preceding year.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

An affidavit of self-employment, signed by the applicant or participant, may be used to document business income and self-employment.

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a business or self -employment income. An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

**The current language is:**

PHA Policy

Business owners and self-employed persons will be required to provide:

An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

All schedules completed for filing federal and local taxes in the preceding year.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year.

The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

**7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS**

**The proposed language is:**

**Social Security/SSI Benefits**

PHA Policy

Each year during the month of October, SSA announces the COLA by which Federal SS and SSI benefits are adjusted to reflect the increase, if any, in the cost of living. The Federal COLA does **not** apply to State-paid disability benefits.

Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining SS and SSI annual income for all annual reexaminations and interim reexaminations (in accordance with PHA-established policy) of family income which have **not** yet been completed **and** will be effective January 1st or later of the upcoming year.

**Example:** Bob Jones currently receives \$500 a month from Social Security Income. His annual re-examination date is effective 02/01/2012, and the PHA starts collecting information from Mr. Jones in November 1, 2011. The Social Security Administration published a notice on December 1, 2011 that the Cost of Living Adjustment (COLA) for calendar year 2012 is 3.6%. The PHA must determine the 2012 annual SS income using the following process:

- Multiply the current benefit amount for 2011 by the COLA for the 2012 year:  $\$500 \times 3.6\%$  [or 0.036] (COLA rate) = **\$18.00 COLA monthly increase**
- Add the COLA increase to the 2011 SS monthly income to determine the 2012 SS income:  $\$500 + \$18 = \mathbf{\$518.00}$  (\$500 current benefit + \$18 COLA = 2012 SS income)
- Calculate the annual income effective 02/01/2012:  $\$518 \times 12 = \mathbf{\$6,216.00}$ .

1. The PHA will use the benefit information reported in EIV that does not include the COLA as third party

- verification as long as the tenant confirms that the income data in EIV is what he/she is receiving;
2. The PHA will use the SSA benefit, award letter or Proof of Income Letter provided by the tenant that includes the COLA adjustment if the date of the letter is within 120 days from the date of receipt by the owner;
  3. The PHA will determine the tenant's income by applying the COLA increase percentage to the current verified benefit amount and document the tenant file with how the tenant's income was determined; or
  4. The PHA may use Social Security Administration News Release or any HUD approved forum such as Nan McKay PIH Alerts to document the tenant file with how the tenant's income was determined.
  5. All incomplete re-certifications effective after January 1<sup>st</sup> **must** reflect the SSA benefit that includes the COLA.

**The current language is:**

PHA Policy

To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s), the PHA will help <http://help> the applicant request a benefit verification letter from SSA's Web site at [www.ssa.gov](http://www.ssa.gov) <http://www.ssa.gov> or ask the family to request one by calling SSA at 1-800-772-1213. Once the applicant has received the benefit verification letter they will be required to provide it to the PHA.

To verify the SS/SSI benefits of participants, the PHA will obtain information about social security/SSI benefits through the HUD EIV System, and confirm with the participant(s) that the current listed benefit amount is correct. If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the PHA will request a current SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s) the PHA will help <http://help> the participant request a benefit verification letter from SSA's Web site at [www.ssa.gov](http://www.ssa.gov) <http://www.ssa.gov> or ask the family to request one by calling SSA at 1-800-772-1213. Once the participant has received the benefit verification letter they will be required to provide it to the PHA.

### 7-III.D. ALIMONY OR CHILD SUPPORT

**The proposed language is:**

PHA Policy

The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it **receives irregular or no payments**, in addition to the verification process listed above, the PHA will refer to Chapter **6-I.K.** Alimony and Child support.

If there was a significant change in disbursement during the 12 months reported, the PHA must determine if a different calculation should be used. If the PHA uses a calculation other than the last 12 months disbursement total, an explanation must be noted in the applicant/participant file.

**The current language is:**

PHA Policy

The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it **receives irregular or no payments**, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include a statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts.

If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts.

*Note:* Families are not required to undertake independent enforcement action.

### **Proposal 6:**

HUD requires PHA's to account for SSA COLA increases during the annual recertification process. Staff recommends amending the policy to capture COLA increases for incomplete recertification effective January 1<sup>st</sup> or later. Regarding the interim recertification policy staff recommends to identify PHA-initiated and Family-initiated interims. PHA staff start PHA-initiated interims. The family starts family-initiated interims. AAHC provided clarification regarding when the PHA and the family must initiate interim recertifications.

### **11-I.B STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(b)]**

#### **The proposed language is:**

##### PHA Policy

Effective the day after SSA has announced the COLA, PHAs are required to factor in the COLA when determining SS and SSI annual income for all annual reexaminations and interim reexaminations (in accordance with PHA-established policy) of family income which have not yet been completed and will be effective January 1st or later of the upcoming year [PIH Notice 2018-24]. See Chapter 7-III.C., for verification methods.

#### **The current language is:**

##### PHA Policy

The PHA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. The PHA will document in the file how the determination that a source of income was fixed was made.

### **11-II.C. CHANGES AFFECTING INCOME OR EXPENSES**

#### **The proposed language is:**

#### **PHA-Initiated Interim Reexaminations**

PHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by the PHA. They are not scheduled because of changes reported by the family.

##### PHA Policy

The PHA will conduct interim reexaminations to account for the following that occur between annual re-examinations:

*The language regarding families participating in the FSS program was removed from this area because AAHC can not anticipate the loss, decrease or increase of earned income.*

#### **The current language is:**

##### PHA Policy

The PHA will conduct interim reexamination in each of the following instances:

- For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the 24-month eligibility period.
- The PHA will conduct an interim reexamination at any time for families participating in the Family Self-Sufficiency (FSS) program, in an effort to increase family's escrow accounts.

- If the family has reported zero income, the PHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income.
- If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.
- If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification become available, the PHA will conduct an interim reexamination.

The PHA may conduct an interim reexamination at any time in order to correct an error in previous reexamination, or to investigate tenant fraud complaint.

### **The proposed language is:**

#### **Family-Initiated Interim Reexaminations**

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

##### PHA Policy

Families are required to report within 10 business days of the date the change takes effect:

- Any decreases in income, or
- Any changes in an adult student status or financial aid or scholarships; and
- Any new sources of expense or increases and decrease in expenses; and
- A disabled head, co-head, or spouse must report any new source, increase, or decrease in earned income; and
- Any new sources of income or increases in a current source of income; and

The PHA will conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase.

The PHA will conduct interim reexaminations for families that participate in the Family Self-sufficiency (FSS) program and only when the FSS escrow will change as a result of the increase or decrease in income.

In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

Families are required to report all changes in income, expenses, assets, and family composition affecting income. These change will be documented in response to HUD EIV New Hires, Income Discrepancy, and Unreported Income reports.

### **The current language is:**

##### PHA Policy

Families are required to report all changes in family composition and increases in income, including new employment, SS, SSI, FIP, etc., within 10 business days of the date the change takes effect.

If at any time the family has reported zero income, the PHA will conduct an interim reexamination if income is identified, or if the zero income family reports they now receive income.

The PHA will conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase.

Prepared by: 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 waiting list is amended to bring AAHC administrative policies in line with it's online application system and to provide clarifying language; and

WHEREAS, the policy language regarding income and verification of identity is amended to bring operating procedures in line with AAHC's administrative policies; and

WHEREAS, the policy language regarding annual re-certifications is amended as a measure to streamline processes; and

WHEREAS, the policy language regarding interim re-certifications is amended in an effort to provided clarification to PHA-initiated as well as family-initiated interim re-certifications; and

RESOLVED, that the Board of the Ann Arbor Housing Commission approve the revisions to the Administrative Plan as described in the memorandum above to take effect on May 1, 2019.