



Legislation Text

File #: 19-1597, Version: 1

Resolution to Amend the Administrative Plan Regarding Chapter 11 Re-examinations

Chapter 11: REEXAMINATIONS

11-II.C. CHANGES AFFECTING INCOME OR EXPENSES

Interim reexaminations can be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change. When a family reports a change, the PHA may take different actions depending on whether the family reported the change voluntarily, or because it was required to do so.

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.

AAHC Current Policy

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

- For families receiving the Earned Income Disallowance (EID), PHA will conduct an interim reexamination at the start, phase-in, and conclusion of the 24-month eligibility period.
- If the family reports zero income, the PHA will follow the zero income check back procedures outlined in Chapter 7. The PHA will perform an interim re-exam if it is determined the family has 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.

Proposed AAHC Policy

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

- Any new sources of income.
- Any increases in current source of income of \$4,800 or more per year.

- For families receiving the Earned Income Disallowance (EID), PHA will conduct an interim reexamination at the start, phase-in, and conclusion of the 24-month eligibility period.
- If the family reports zero income, the PHA will follow the zero income check back procedures outlined in Chapter 7. The PHA will perform an interim re-exam if it is determined the family has income.
- If at the time of the annual reexamination, it is difficult to anticipate a level of income for the next 12 months because of seasonal or cyclical income or a new job or self-employment, the PHA will conduct the annual examination based on the information available and 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.

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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 Ann Arbor Housing Commission experienced a shortfall of over \$1 million in Housing Assistance Payment (HAP) funding in Calendar Year 2019; and

WHEREAS, the current policy requires tenants to report changes in income, but only requires an interim income certification to be conducted in the situations in the above memorandum; and

WHEREAS, AAHC staff recommend that interim reexaminations should be conducted if a household reports a new source of income or if an existing source of income will increase by \$4,800 or more a year which will result in an increase in the tenants portion of rent and a decrease in the HAP portion of the rent; 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 November 1, 2019.