



Legislation Text

File #: 14-0577, **Version:** 2

To Approve Amendments to the Housing Choice Voucher Administrative Plan regarding Waitlists, Service Area, Denial of Application, Project-Based Vouchers, Homeownership, Utility Reimbursements, EID, Student Financial Aid, HQS Reinspection Fees, and Utility Allowance Schedules

The Ann Arbor Housing Commission's Housing Choice Voucher Administrative Plan details its policies and procedures for the management of its Section 8/Housing Choice Voucher (HCV) Program. The AAHC periodically revises the Plan to reflect changes in HUD policies and changes in AAHC policies.

The following policy revisions were included in the AAHC FY15 Annual Plan that can be taken based on AAHC board action:

1. Combine the public housing waitlist with the voucher waitlist once there are no longer any public housing units.
2. Remove Western Wayne County from the AAHC voucher service area
3. Increase minimum requirements to participate in the Homeownership and Family Self Sufficiency program.
4. Remove the requirement to deny an application from a household who has a member who has been evicted from federally assisted housing in last 5 years for a drug-related criminal activity. The AAHC requires that household member to be removed from the application. HUD allows the AAHC to admit that household member if they have completed an approved drug rehabilitation program for a drug-related activity that occurred in last 3 years.
5. Remove the requirement to deny an application from a household that has been evicted from federally subsidized housing in the last 3 years.
6. The PHA will advertise its request for proposals (RFP) for proposals selected under another competition, existing, rehabilitated and newly constructed housing in local newspapers that are either on-line or newsprint.
7. The PHA will publish its advertisement in the newspaper for at least one day per week for two consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Proposals will be due in the PHA office no sooner than by close of business 30 calendar days from the date of the last publication.

The following policy revisions were included in the AAHC FY15 Annual Plan that can be taken based on AAHC board action and HUD adoption of its proposed streamlining policies (PIH Notice 2015-04):

1. Revision of the rule on documentation of social security numbers (SSNs). The proposed rule would permit PHAs to defer documentation for children less than 6 years of age in applicant families for up to 90 days after admission, in cases where the child does not yet have an SSN.
2. A provision for issuing utility reimbursement payments quarterly, rather than monthly, when the quarterly total does not exceed \$20.
3. Revisions to the regulations governing the earned income disallowance (EID). The proposed rule would limit EID eligibility to 24 consecutive months, eliminating the need for tracking the exclusion over a period of up to 48 months. The rule would retain the current 12-month full exclusion period, and would then offer PHAs the flexibility to phase in a rent increase by excluding at least 50 percent of increased income for an additional 12 months, for family members who remain continuously employed.
4. Exclusion of mandatory fees from student financial aid, where applicable. While this change is categorized as applicable to all programs, student financial aid is currently excluded from annual income in the PH program.
5. The option to charge reinspection fees to owners, when the owner reports that an HQS violation has been corrected but inspection reveals that the violation still exists. The optional reasonable fee could be charged to owners, but not to program applicants or participants.
6. Revision of the regulations governing utility allowance schedules. The proposed rule would permit PHAs to classify units as “attached” or “detached,” reducing the number of unit types for which allowances must be calculated.

Prepared and 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 Section 8/Housing Choice Voucher (HCV) Program; and

WHEREAS, The AAHC may periodically revise its Administrative Policy staff are recommending the following changes that were published in the FY15 Annual Plan:

1. Combine the public housing waitlist with the voucher waitlist once there are no longer any public housing units.
2. Remove Western Wayne County from the AAHC voucher service area
3. Increase minimum requirements to participate in the Homeownership and Family Self Sufficiency program.
4. Remove the requirement to deny an application from a household who has a member who has been evicted from federally assisted housing in last 5 years for a drug-related criminal activity. Add the option for the AAHC to admit that household member if they have completed an approved drug rehabilitation program for a drug-related activity that occurred in last 3 years.

5. Remove the requirement to deny an application from a household that has been evicted from federally subsidized housing in the last 3 years and make the denial optional based on a review of the tenant's application and history.
6. The PHA will advertise its request for proposals (RFP) for proposals selected under another competition, existing, rehabilitated and newly constructed housing in local newspapers that are either on-line or newsprint.
7. The PHA will publish its advertisement in the newspaper for at least one day per week for two consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Proposals will be due in the PHA office no sooner than by close of business 30 calendar days from the date of the last publication; and

WHEREAS, HUD has published the proposed policy changes which may be adopted after HUD finalizes the changes and staff recommend that these changes be adopted and implemented as soon as it is feasible:

1. Revision of the rule on documentation of social security numbers (SSNs). The proposed rule would permit PHAs to defer documentation for children less than 6 years of age in applicant families for up to 90 days after admission, in cases where the child does not yet have an SSN.
2. A provision for issuing utility reimbursement payments quarterly, rather than monthly, when the quarterly total does not exceed \$20.
3. Revisions to the regulations governing the earned income disallowance (EID). The proposed rule would limit EID eligibility to 24 consecutive months, eliminating the need for tracking the exclusion over a period of up to 48 months. The rule would retain the current 12-month full exclusion period, and would then offer PHAs the flexibility to phase in a rent increase by excluding at least 50 percent of increased income for an additional 12 months, for family members who remain continuously employed.
4. Exclusion of mandatory fees from student financial aid, where applicable. While this change is categorized as applicable to all programs, student financial aid is currently excluded from annual income in the PH program.
5. The option to charge reinspection fees to owners, when the owner reports that an HQS violation has been corrected but inspection reveals that the violation still exists. The optional reasonable fee could be charged to owners, but not to program applicants or participants.
6. Revision of the regulations governing utility allowance schedules. The proposed rule would permit PHAs to classify units as "attached" or "detached," reducing the number of unit types for which allowances must be calculated.

NOW, THEREFORE BE IT RESOLVED that the Board of the Ann Arbor Housing Commission approve the revisions to the Administrative Plan for the Housing Choice Voucher Program for the seven changes that can be implemented immediately, to take effect July 1, 2015.

NOW, THEREFORE BE IT RESOLVED that the Board of the Ann Arbor Housing Commission approve the revisions to the Administrative Plan for the Housing Choice Voucher Program for the six changes that require HUD final approval to take effect 60 days after HUD final approval.