

Before Starting the CoC Application

You must submit all three of the following parts in order for us to consider your Consolidated Application complete:

1. the CoC Application,
2. the CoC Priority Listing, and
3. all the CoC's project applications that were either approved and ranked, or rejected.

As the Collaborative Applicant, you are responsible for reviewing the following:

1. The FY 2024 CoC Program Competition Notice of Funding Opportunity (NOFO) for specific application and program requirements.
2. The FY 2024 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.

Your CoC Must Approve the Consolidated Application before You Submit It
- 24 CFR 578.9 requires you to compile and submit the CoC Consolidated Application for the FY 2024 CoC Program Competition on behalf of your CoC.
- 24 CFR 578.9(b) requires you to obtain approval from your CoC before you submit the Consolidated Application into e-snaps.

Answering Multi-Part Narrative Questions

Many questions require you to address multiple elements in a single text box. Number your responses to correspond with multi-element questions using the same numbers in the question. This will help you organize your responses to ensure they are complete and help us to review and score your responses.

Attachments

Questions requiring attachments to receive points state, "You Must Upload an Attachment to the 4B. Attachments Screen." Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process. Include a cover page with the attachment name.

- Attachments must match the questions they are associated with—if we do not award points for evidence you upload and associate with the wrong question, this is not a valid reason for you to appeal HUD's funding determination.

- We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time).

1A. Continuum of Care (CoC) Identification

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1A-1. CoC Name and Number: CA-601 - San Diego City and County CoC

1A-2. Collaborative Applicant Name: Regional Task Force on the Homeless

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Regional Task Force on the Homeless

1B. Coordination and Engagement–Inclusive Structure and Participation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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1B-1.	Inclusive Structure and Participation–Participation in Coordinated Entry.	
	NOFO Sections V.B.1.a.(1), V.B.1.e., V.B.1f., and V.B.1.p.	
	In the chart below for the period from May 1, 2023 to April 30, 2024:	
1.	select yes or no in the chart below if the entity listed participates in CoC meetings, voted—including selecting CoC Board members, and participated in your CoC's coordinated entry system; or	
2.	select Nonexistent if the organization does not exist in your CoC's geographic area:	

	Organization/Person	Participated in CoC Meetings	Voted, Including Electing CoC Board Members	Participated in CoC's Coordinated Entry System
1.	Affordable Housing Developer(s)	Yes	Yes	Yes
2.	CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
3.	Disability Advocates	Yes	Yes	Yes
4.	Disability Service Organizations	Yes	Yes	Yes
5.	EMS/Crisis Response Team(s)	Yes	Yes	Yes
6.	Homeless or Formerly Homeless Persons	Yes	Yes	Yes
7.	Hospital(s)	Yes	Yes	Yes
8.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Yes	No	Yes
9.	Law Enforcement	Yes	Yes	Yes
10.	Lesbian, Gay, Bisexual, Transgender (LGBTQ+) Advocates	Yes	Yes	Yes
11.	LGBTQ+ Service Organizations	Yes	Yes	Yes
12.	Local Government Staff/Officials	Yes	Yes	Yes
13.	Local Jail(s)	Yes	No	No
14.	Mental Health Service Organizations	Yes	Yes	Yes
15.	Mental Illness Advocates	Yes	Yes	Yes
16.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes	Yes	Yes

17.	Organizations led by and serving LGBTQ+ persons	Yes	Yes	Yes
18.	Organizations led by and serving people with disabilities	Yes	Yes	Yes
19.	Other homeless subpopulation advocates	Yes	No	Yes
20.	Public Housing Authorities	Yes	Yes	Yes
21.	School Administrators/Homeless Liaisons	Yes	Yes	Yes
22.	Street Outreach Team(s)	Yes	Yes	Yes
23.	Substance Abuse Advocates	Yes	Yes	No
24.	Substance Abuse Service Organizations	Yes	Yes	Yes
25.	Agencies Serving Survivors of Human Trafficking	Yes	Yes	Yes
26.	Victim Service Providers	Yes	Yes	Yes
27.	Domestic Violence Advocates	Yes	Yes	Yes
28.	Other Victim Service Organizations	Yes	Yes	Yes
29.	State Domestic Violence Coalition	Yes	Yes	Yes
30.	State Sexual Assault Coalition	Yes	Yes	Yes
31.	Youth Advocates	Yes	Yes	Yes
32.	Youth Homeless Organizations	Yes	Yes	Yes
33.	Youth Service Providers	Yes	Yes	Yes
	Other: (limit 50 characters)			
34.	Local Buisnessess	Yes	Yes	Yes
35.	Private Foundations	Yes	Yes	Yes

1B-1a.	Experience Promoting Racial Equity.	
	NOFO Section III.B.3.c.	

Describe in the field below your CoC's experience in effectively addressing the needs of underserved communities, particularly Black and Brown communities, who are substantially overrepresented in the homeless population.

(limit 2,500 characters)

Race is the largest predictive factor for homelessness in the United States. And today in the San Diego region, where Black people make up only five percent of the population, Black people are: 6 times more likely than non-Black people to experience homelessness; 5 times more likely than non-Black people to experience unsheltered homelessness. 7 times more likely than non-Blacks to experience sheltered homelessness.

RTFH, as the CoC has acted to evaluate racial, ethnic, and gender disparities in the CoC system. Subsequent to the evaluation, the following actions were recommended by Ad Hoc Committee: Addressing Homelessness Among Black San Diegans the adopted by the Board: develop a HMIS data dashboard to track our progress on equity goals; inclusive procurement; training and education; mentorship of black led organizations; center the voices of people with lived experience who are black; and transform the crisis response system. To promote equity of access to and provision of housing and service throughout the CoC, RTFH has taken the following actions: expand training opportunities for all staff with a particular focus on front-line program staff on specific diversity, equity and inclusion topics, such as implicit bias, creating an equitable culture, understanding the effects of racial trauma, Anti-racism and Anti-oppression, and responding to persons with disabilities; Review agency documents to assess if program policies, practices and procedures are inclusive and sensitive to the various cultures of those receiving homeless services, and update policies as necessary to ensure inclusion and sensitivity; Identify barriers to participation faced by underserved groups, including but not limited to racial, ethnic, gender, and persons with disabilities, and amend agency policies and protocols to reduce these barriers. Provide training on recruiting practices to support diversifying front-line staff and leadership; Participate in training on Equal Access and Anti-Discrimination offered by the CoC; the Rating and Ranking criteria includes measures of commitment to specific actions from Project Applicants to furthering equity, inclusion, and equal access; mapping out the informal system that currently exists through faith-based organizations in order to develop and provide effective and appropriate support.

1B-2.	Open Invitation for New Members.	
	NOFO Section V.B.1.a.(2)	
	Describe in the field below how your CoC:	
	1.	communicated a transparent invitation process annually (e.g., communicated to the public on the CoC's website) to solicit new members to join the CoC;
	2.	ensured effective communication and access for persons with disabilities, including the availability of accessible electronic formats; and
	3.	invited organizations serving culturally specific communities experiencing homelessness in your CoC's geographic area to address equity (e.g., Black, Latino, Indigenous, LGBTQ+, and persons with disabilities).

(limit 2,500 characters)

1. Official invitation to join the general membership occurs annually in the first quarter but continues throughout the year. Open, CoC monthly Membership Meetings are announced to the public via website postings, email distribution and announcements at various stakeholder meetings. RTFH participation in homeless service provider meetings create regional awareness via the Alliance for Regional Solutions, East County Task Force, HEAL, Youth Action Board, Center for Justice and Reconciliation, Youth Consortium. Social and print media (Homelessness News; Voice of San Diego) inform diverse constituents about CoC activities. Ad hoc committee members, many with lived experience, are encouraged to join membership, and present on their work. RTFH Leadership encourages membership at all speaking engagements, panels, community sessions, and presentations. RTFH Annual Conference on Homelessness welcomes 800+ persons and features panels with PLE. Regional connections are made during participation in service provider meetings, public forums, and media events. RTFH's full-time outreach staff lead groups at regionally planned outreach events and ensure that other outreach workers and people being served are aware of CoC membership. Leaders participate in HEAL Network and Voices of our City events, comprised of people with lived experience, giving them a chance to educate others on the value of CoC membership.

2. Web post formats (PDF, WordDocX. Large Print) and virtual meetings accommodate disabilities; and a resource list ensures accessibility. The CoC website is compliant with screen reader technologies and tabbing.

3 CoC continuously invites specific communities via A Committee on Addressing Homelessness Among Black San Diegans (AHABSD); a Committee on Health and Homelessness; a Committee on Aging and Homelessness; and connections between American Indian Health and the CoC. Committees are led by advisory board members who extend invitations to others. CoC connects to the LGBTQ Center, All of Us or None, Black Workers' Center, Able-Disabled, and Urban League. The AHABSD membership intentionally invites geographic, cultural, and grassroots organization representation. State funding supports culturally-specific awareness training, financial support for BIPOC organizations, and BIPOC engagement.

1B-3.	CoC's Strategy to Solicit/Consider Opinions on Preventing and Ending Homelessness.	
	NOFO Section V.B.1.a.(3)	
	Describe in the field below how your CoC:	
	1. solicited and considered opinions from a broad array of organizations and individuals that have knowledge of homelessness, or an interest in preventing and ending homelessness;	
	2. communicated information during public meetings or other forums your CoC uses to solicit public information;	
	3. ensured effective communication and access for persons with disabilities, including the availability of accessible electronic formats; and	
	4. took into consideration information gathered in public meetings or forums to address improvements or new approaches to preventing and ending homelessness.	

(limit 2,500 characters)

1. CoC uses multiple forms of communications to solicit and consider opinions. Through the CoC List serve, CoC email list, website, social media open public to comments, and public comment via the RTFH website and surveys. Significant community input on the Regional Plan in public meetings held regionally to ensure representation and gather insights directly from the community, including leaders, PLE, providers and advocates. CoC held multiple symposiums, including topics such as outreach and unsheltered homelessness, and consultant-led DEI symposiums with PLE, and outreach teams across the region engaging with front-line workers.

2. RTFH leadership team is consistently present at public meetings, panels, business groups, civic groups, meeting with elected officials and staff to discuss strategies to address homelessness, reducing mis-information and stigma, sharing data and critical practices such as housing first, with a strong emphasis on active listening to bring feedback and concerns back to the CoC. RTFH uses kiosks from Pulse for Good at various service provider locations to collect feedback at community events aimed at homeless population. The committee on Addressing Homelessness Among Black San Diegans did significant work within both the unsheltered and sheltered population. Consultants collected the experiences of Black San Diegans in the crisis response system. The data formed the foundation of a report and recommended actions were adopted by the CoC and incorporated in the CoC's Regional Plan. The inaugural RTFH Conference on Homelessness facilitated knowledge-sharing and collaboration within the CoC.

3. Insight is sought on how best to serve those experiencing unsheltered homelessness. The Local Government and Community Liaison is crucial in presenting these ideas to local jurisdictions and communicated to the appropriate governmental entities. Intensive planning sessions in collaboration with PHAs, County of San Diego, PLE, and YAB. Feedback and public comments are incorporated into the Regional Plan and action reports ensuring that the strategies and policies formed are comprehensive and in line with community needs and suggestions. Communications in virtual meetings accommodate disabilities with features like captions and AI notes.

4. Information gathered via this structured approach are discussed at CoC Board sessions, retreats, advisory groups, and open community forums. Recommendations are incorporated into policy and priority planning.

1B-4.	Public Notification for Proposals from Organizations Not Previously Awarded CoC Program Funding.	
	NOFO Section V.B.1.a.(4)	
	Describe in the field below how your CoC notified the public:	
	1. that your CoC will consider project applications from organizations that have not previously received CoC Program funding;	
	2. about how project applicants must submit their project applications—the process;	
	3. about how your CoC would determine which project applications it would submit to HUD for funding; and	
	4. ensured effective communication and access for persons with disabilities, including the availability of accessible electronic formats.	

(limit 2,500 characters)

1. An announcement regarding the local process and a call for applications was sent to the CoC listserv with over 1600 contacts, shared on the CoC website's NOFO section, distributed through social media channels (Facebook, X), and communicated at public CoC membership meetings as well as board and committee meetings. Each outreach effort encouraged participation from new applicants. The community was informed about the available technical assistance to support applicants throughout the process. The Call for Applications emphasized two special funding opportunities through Bonus Projects and the reallocation of Annual Renewal Demand (ARD) funds. Specific instructions were provided for new agencies, including setting up Dropbox access and directing them to the RTFHSD.org website for more details.

2 Summaries of the FY2024 CoC NOFO, along with general and detailed application instructions, were uploaded to the NOFO page on the CoC website. The application process, including steps, timelines, and requirements, was clearly outlined, and a webinar and workshop were offered for additional support. Links to documents, video presentations, and HUD and other resources were also made available to provide further guidance.

3 The public was notified that a Rating and Ranking Group is responsible for reviewing, scoring, determining funding allocations, and organizing project applications for each CoC competition. This process is driven by data and considers an organization's past performance, fiscal and administrative capabilities, as well as criteria and benchmarks specific to each project type. Key factors evaluated include project design, necessity, type, and benefit to the CoC. Protocols for ranking, policies for reallocation, performance improvement plans, and scoring tools with benchmarks and points were all made accessible on the website before local submission deadlines.

4 To ensure accessibility, the information was provided in PDF, WordDocX, and Large Print formats, and virtual meetings accommodated disabilities with features such as captions. A list of resources was posted, and all website content was designed to be compatible with screen readers and keyboard navigation. Additional accommodations, including sign language interpretation and FCC Relay services for hearing support, were offered as needed.

1C. Coordination and Engagement

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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1C-1.	Coordination with Federal, State, Local, Private, and Other Organizations.	
	NOFO Section V.B.1.b.	
	In the chart below:	
1.	select yes or no for entities listed that are included in your CoC's coordination, planning, and operations of projects that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness; or	
2.	select Nonexistent if the organization does not exist within your CoC's geographic area.	

	Entities or Organizations Your CoC Coordinates with for Planning or Operations of Projects	Coordinates with the Planning or Operations of Projects?
1.	Funding Collaboratives	Yes
2.	Head Start Program	Yes
3.	Housing and services programs funded through Local Government	Yes
4.	Housing and services programs funded through other Federal Resources (non-CoC)	Yes
5.	Housing and services programs funded through private entities, including Foundations	Yes
6.	Housing and services programs funded through State Government	Yes
7.	Housing and services programs funded through U.S. Department of Health and Human Services (HHS)	Yes
8.	Housing and services programs funded through U.S. Department of Justice (DOJ)	Yes
9.	Housing Opportunities for Persons with AIDS (HOPWA)	Yes
10.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Yes
11.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes
12.	Organizations led by and serving LGBTQ+ persons	Yes
13.	Organizations led by and serving people with disabilities	Yes
14.	Private Foundations	Yes
15.	Public Housing Authorities	Yes
16.	Runaway and Homeless Youth (RHY)	Yes
17.	Temporary Assistance for Needy Families (TANF)	Yes
	Other:(limit 50 characters)	
18.		

1C-2.	CoC Consultation with ESG Program Recipients.	
	NOFO Section V.B.1.b.	

In the chart below select yes or no to indicate whether your CoC:

1.	Consulted with ESG Program recipients in planning and allocating ESG Program funds?	Yes
2.	Provided Point-in-Time (PIT) count and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area?	Yes
3.	Ensured local homelessness information is communicated and addressed in the Consolidated Plan updates?	Yes
4.	Coordinated with ESG recipients in evaluating and reporting performance of ESG Program recipients and subrecipients?	Yes

1C-3.	Ensuring Families are not Separated.	
	NOFO Section V.B.1.c.	

Select yes or no in the chart below to indicate how your CoC ensures emergency shelter, transitional housing, and permanent housing (PSH and RRH) do not deny admission or separate family members regardless of each family member's self-reported sexual orientation and gender identity:

1.	Conducted mandatory training for all CoC- and ESG-funded service providers to ensure families are not separated?	No
2.	Conducted optional training for all CoC- and ESG-funded service providers to ensure family members are not separated?	Yes
3.	Worked with CoC and ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients?	Yes
4.	Worked with ESG recipient(s) to identify both CoC- and ESG-funded facilities within your CoC's geographic area that might be out of compliance and took steps to work directly with those facilities to bring them into compliance?	Yes
5.	Sought assistance from HUD by submitting questions or requesting technical assistance to resolve noncompliance by service providers?	Yes

1C-4.	CoC Collaboration Related to Children and Youth—SEAs, LEAs, School Districts.	
	NOFO Section V.B.1.d.	

Select yes or no in the chart below to indicate the entities your CoC collaborates with:

1.	Youth Education Provider	Yes
2.	State Education Agency (SEA)	Yes
3.	Local Education Agency (LEA)	Yes
4.	School Districts	Yes

1C-4a.	Formal Partnerships with Youth Education Providers, SEAs, LEAs, School Districts.	
	NOFO Section V.B.1.d.	

Describe in the field below the formal partnerships your CoC has with at least one of the entities where you responded yes in question 1C-4.

(limit 2,500 characters)

SEAs: RTFH maintains a formal partnership with the SDCOE, that maintains partnerships with the SEA. California's three-level system of public education: the California State DOE, county offices of education (COE), and local school districts. Regulations, funding, and policy decisions are made at the state level, and the daily operations fall to over 1,000 districts in the state. COE, the intermediate level in system, provides infrastructure for local schools and districts and fulfills state mandates such as developing countywide programs to serve students with special needs. School liaisons link youth to services and join CoC agencies to identify and respond to special needs of homeless children. CoC Members engage in SEA and LEA events. The COE Special Needs Division creates a report listing grades, school, and number of homeless children for each school which the CoC uses to assess needs. CoC enjoys National Center for Homeless Education Technical support for EHCY programs. CoC-DOE commitment to cross-sector and cross-system work is shown in CoC-Schools District collaboration. A Youth Consortium works with schools to build awareness of available CoC services and supports. Joint work informs us about the size, scope and nature of housing insecurity in youth and young adults, and who are undocumented or unaccompanied. Youth often interface with education, probation, and child welfare. Workgroups aim to address the needs holistically. Comprehensive Community Plan goal 8 strives to have routine, consistent process for screening and identifying youth at-risk of homelessness; and using early warning signs that a youth is falling behind and may fail to graduate. The CoC works to ensure efforts are sustainable structures throughout the region.

1C-4b.	Informing Individuals and Families Who Have Recently Begun Experiencing Homelessness about Eligibility for Educational Services.	
	NOFO Section V.B.1.d.	

Describe in the field below written policies and procedures your CoC uses to inform individuals and families who have recently begun experiencing homelessness of their eligibility for educational services.

(limit 2,500 characters)

CoC-funded projects serving families abide by the local Educational Assurances Policy (EAP). CoC Membership meetings and annual reviews remind agencies of the EAP policy requiring several actions, including advising families of their educational rights. This long-standing CoC policy, established in 2013, requires all projects to have formal protocols to ensure children are enrolled in school or preschool, and families are provided guidance and support to do so. 2023-24 CoC Training Covered the Educational Assurances Policy.

Compliance review is part of program monitoring with corrective actions established if the policy is not enforced. The EAP requirements feature: identification of the staff whose job is to ensure children are enrolled in school consistent with HUD policy and the Elementary and Secondary Education Act; that an EAP is on file and posted by every CoC project serving households with children; empowering family choice for selecting housing near child's school; assisting DV families to enroll children in a public school of their choice and procedures to ensure safety; offering families a letter verifying eligibility for services; ensuring transportation is secured until transportation is offered under the Mc Kinney-Vento provisions from the school; reviewing rights with parents and staff; compliance with Family Educational Rights Privacy Act; advocacy when educational rights are violated; and exit plans to include education; and SEA and LEA contact when warranted.

YHDP providers have formal agreements to screen all clients for education and job opportunities with a standard of a 90% successful outcome for linking youth to appropriate resources. Providers help inform youth of an array of potential supports in both traditional and non-traditional education settings. YHDP projects offer tangible support and advocacy for TAY seeking to extend their options for education and training beyond GED or high school. YHDP projects also alert youth of their rights to education and how to succeed when enrolled in education and training.

1C-4c.	Written/Formal Agreements or Partnerships with Early Childhood Services Providers.	
	NOFO Section V.B.1.d.	

Select yes or no in the chart below to indicate whether your CoC has written formal agreements or partnerships with the listed providers of early childhood services:

		MOU/MOA	Other Formal Agreement
1.	Birth to 3 years	No	Yes
2.	Child Care and Development Fund	No	Yes
3.	Early Childhood Providers	No	Yes
4.	Early Head Start	No	Yes
5.	Federal Home Visiting Program--(including Maternal, Infant and Early Childhood Home and Visiting or MIECHV)	No	Yes
6.	Head Start	No	Yes
7.	Healthy Start	No	Yes
8.	Public Pre-K	No	Yes
9.	Tribal Home Visiting Program	No	Yes
	Other (limit 150 characters)		
10.			

1C-5.	Addressing Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking—Collaboration with Federally Funded Programs and Victim Service Providers.
	NOFO Section V.B.1.e.

In the chart below select yes or no for the organizations your CoC collaborates with:

	Organizations	
1.	State Domestic Violence Coalitions	Yes
2.	State Sexual Assault Coalitions	Yes
3.	Anti-trafficking Service Providers	Yes
	Other Organizations that Help this Population (limit 500 characters)	
4.	Foundation and Higher Education Research and Special Support (PLNU, SDSU, USD)	Yes

1C-5a.	Collaborating with Federally Funded Programs and Victim Service Providers to Address Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	

Describe in the field below how your CoC regularly collaborates with organizations that you selected yes to in Question 1C-5 to:

1.	update CoC-wide policies; and
2.	ensure all housing and services provided in the CoC's geographic area are trauma-informed and can meet the needs of survivors.

(limit 2,500 characters)

1. In an effort to link the CoC to broader policy discussions and strategic improvement efforts, leaders from more than 15 CoCs and state reps convene for meetings of the Southern CA CoC Alliance. Policies at the state level surpass VAWA advocacy groups, local service providers (HUD funded and not) and DV households are all impacted by the CoC. As a Southern Regional State Representative for the CA Partnership to End Domestic Violence, CA's official coalition against domestic abuse and assault, a CoC provider (CRC), fulfills this role. RTFH and ESG recipients discuss DV issues with state leaders. Together with faith based and educational responses, local coordination with homeless service organizations, the Public Defender's office, ESG, VSP, and CESEC groups consistently strengthen the partnerships and strategies necessary to end Human Trafficking (HT). The collaborative goal of ending HT permeates data, information, and best practice strategies to harness strong relationships and work streams. Efforts to form CoC protocols and integration of DV into the CES system are in, it is the continued partnerships and vision sharing by stakeholders that will lead to the development of consistent, privacy based and victim empowered protocols in the future. 2. End users of CoC agencies are trained by certified state trainers; which provide additional resources to empower DV households through the process. Trainings and education for end users enhance the application of trust network obligations; These trainings include best practices around motivational interviewing and engagement, trauma informed care, how to work with community resources to navigate the legal pathways of self-preservation and restraint for those served, and landlord engagement to better apply their understanding of lease and tenant rights. The CoC continues to develop and implement policies for efficient, secure, and empowered responses to violence, assault, and HT with the support of monthly General Membership sessions, and strong continuing partnerships with VCP's, ESG agencies, the DV ERN (emergency response network), the San Diego domestic violence council, law enforcement, along with public and private health providers. The RTFH annual conference provides a platform for education and further collaboration with providers offering a multifaceted lens in which to improve and hone community efforts to ensure providers and services are trauma informed, consistent in delivery and broad reaching.

1C-5b.	Implemented Safety Planning, Confidentiality Protocols in Your CoC's Coordinated Entry to Address the Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	
	Describe in the field below how your CoC's coordinated entry addresses the needs of DV survivors by including:	
1.	safety planning protocols; and	
2.	confidentiality protocols.	

(limit 2,500 characters)

1. In order to integrate Victims Fleeing DV into the CES while maintaining safety, client choice, and anonymity, the DV CES was developed in collaboration with Victim Service Providers (VSP) and the DV Response Network. Through a series of workgroups with DV providers a system that incorporates an anonymous score from the Triage Tool into the Community Queue was created. To maintain the highest confidentiality, these groups also met and participated in the development of a confidential referral form, with non-identifiable information, which uses an anonymous method to connect those served by DV providers to the CES with confidence and no barriers to access. The referral form gathers assessment scores for CES prioritization, and other non-identifiable data points to confirm eligibility components to ensure that matches to housing resources have the best possible chance for success. CES then links the housing provider to the service provider through a data sharing agreement to provide client information for the housing providers document retention needs. This identifies high risk in order to expedite action and promotes equitable access to a resources. End users integrate this information into the county's 4 regions to expedite referrals through the system with only pertinent information on an ongoing basis. Through this process, it is made sure that people and families who are escaping abuse, harassment, and human trafficking can access mainstream CES resources equitably, anonymously, safely, and with respect to their choice of housing that will best satisfy their needs in a trauma-informed manner.

2. Safety worries persist for the duration that a client uses CoC services. When there is an immediate risk of harm, housing providers within the CoC must, as required by VAWA, provide tenants who have been victims of violence, sexual assault, or stalking, the opportunity to request an emergency transfer of assistance between housing units. This plan identifies tenants eligible for transfer, documentation needed to fulfill a request, privacy protections, the process of an emergency transfer, and guidance for tenant security and protection. This plan is based on the HUD model emergency transfer plan and is accessible through CoC policy documents. Additional safeguards are documented in CES Policies and Procedures, and efforts continue per HUD requirements and Community Standards recommendations.

1C-5c.	Coordinated Annual Training on Best Practices to Address the Needs of Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section V.B.1.e.	

In the chart below, indicate how your CoC facilitates training for project staff and coordinated entry staff that addresses best practices on safety planning and confidentiality protocols:

	Project Staff	Coordinated Entry Staff
1. Training Occurs at least annually?	Yes	Yes
2. Incorporates Trauma Informed best practices?	Yes	Yes
3. Incorporates Survivor-Centered best practices?	Yes	Yes
4. Identifies and assesses survivors' individual safety needs?	Yes	Yes
5. Enhances and supports collaboration with DV organizations?	Yes	Yes
6. Ensures survivors' rights, voices, and perspectives are incorporated?	Yes	Yes

Other? (limit 500 characters)		
7.	Survivor Self-Help Strategies from VSP and PLE	Yes

1C-5d.	Implemented VAWA-Required Written Emergency Transfer Plan Policies and Procedures for Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	

	Describe in the field below:
1.	whether your CoC's written policies and procedures include an emergency transfer plan;
2.	how your CoC informs all households seeking or receiving CoC Program assistance about their rights to an emergency transfer;
3.	what your CoC requires households to do to request emergency transfers; and
4.	what your CoC does in response to households requesting emergency transfers.

(limit 2,500 characters)

1.The CoC Emergency Transfer Plan (ETP) is supported by CES policies, prioritization and referral protocols and CoC written standards. The ETP is made known through the RTFH website, DV Network, outreach groups, CoC meetings, agency notices and agency announcements. 2.When there is an immediate risk of harm, residents in CoC/ESG housing, may request an emergency transfer (ET) of support between housing units. In accordance with VAWA, anyone, regardless of sex, gender identity, sexual orientation, age or household, who has reasonable suspicion that they are in danger of immediate violence or who's experienced assault in the last 90 days may request an ET. DV households are informed of the provisions through the ETP located on RTFH website and is also referenced in the CES Policies and Procedures. 3.A request for ET is initiated in writing, electronically or verbally. To facilitate the yearly assessment of ETP requirements and protocol modifications every RET and referral is recorded. Security protections for confidentiality are paramount. How an ET could happen as well as safety and security advice for tenants is crucial. End users integrate case conference sessions held subregionally, merge anonymous data into the community queue/by name pool and transmit referrals via the system only using pertinent and required data. This procedure ensures that those experiencing DV have accessibility to mainstream resources included in the CES without compromising their safety, privacy or ability to live in a way that both satisfies their housing needs and honors the trauma they have experienced. 4.The RET response is immediate, based on the survivor's idea of safe housing, and prioritizes rapidly moving victims to safe housing. DV screening assesses initial lethality and urgent safety issues. Interagency transfers between CoC or ESG VSP projects are accelerated while internal transfers to an empty unit can occur immediately. A temporary site guarantees DVS safety in the event that a relocation is not immediate. External transfers to another CoC or via the DV network are possible as well. To reduce barriers staff members advocate and collaborate with other protective systems (CSW, corrections and mainstream services). Case managers assist in locating victims and informing them of available housing and safety measures. Regionally workgroups and providers assist people escaping DV through the CES DV procedures.

1C-5e.	Facilitating Safe Access to Housing and Services for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	

Describe in the field below how your CoC ensures households experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking have safe access to all of the housing and services available within your CoC's geographic area.

(limit 2,500 characters)

Tools used to ensure full and safe access to all housing and services include policies, training, victim input for culturally relevant assessment, strategies to reduce barriers, and system-wide tracking.

Policies – fidelity to a low barrier, housing first model; adherence to the Equal Access Rule and VAWA guidelines; educational assurance policies; policies furthering equity; regular training in trauma-informed care, motivational engagement, empowerment; and use of positive intervention scaffolding help ensure fair access to safe housing. Housing First prohibits programs from denying access to persons fleeing violence or with a DV history. CES and ETP promote equitable access to all CoC housing and service options.

YAB and PLE input developed a CES process with protocols that ensure the safety of survivors. Protocols ensure protection of personal information; risk, safety and lethality assessment; priority for Emergency Transfer, and reduction of barriers. Data collection and CES protect client confidentiality and empower client choice. Low barrier access helps overcome issues with income or documentation; Equal Access ensures the client's right to define the 'family'; ETP offers priority and rapid response to immediate danger; and educational assurance helps remedy school concerns for children and help navigate the multiple systems for families involved in Child protection, justice, or corrections.

CoC trainings teach providers about access rules, victim culture, and best-practices. Input about system issues from listening to victims unable to achieve housing and goals because services did not address their needs and exit surveys inform policies. VSP network advises on barriers, cultural, or security issues.

Tracking and analysis of DV access from first touch to permanent housing using the DV database, CES, APR, and LSA. To verify access and policies are implemented by agencies, annual Furthering Equity Reports measure implementation and promote corrective actions to ensure equity and fair access. The combination of policy, victim and VSP input, training, strategies to identify and reduce barriers, and system tracking affords all households equal access to all CoC resources, yet allows for support designed to meet the unique needs of DV households.

1C-5f.	Identifying and Removing Barriers for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section V.B.1.e.	

Describe in the field below how your CoC ensures survivors receive safe housing and services by:

1.	identifying barriers specific to survivors; and
2.	working to remove those barriers.

(limit 2,500 characters)

1. Identifying and removing obstacles for survivors involves a multifaceted look into specific safeguards and policy and procedure documents, as well as individual agency policy and procedures that are in effect. There are legislative and operational impediments and advocates for remedial measures as survivors provide the most valuable and continuous input regarding problems with system accessibility. Access and security issues are informed by communication with the VSP network and with individual VSP. Staff observe that involvement in multiple systems (Child welfare/ justice/courts), can leave survivors caught between conflicting rules and needs. Unequal resource distribution means that safe transfers between communities may not offer what the survivor has included in their recovery plan. This leads to disruption to restabilizing and added stress and trauma.

2. Listening to victims who were denied homes and goals due to programmatic downturns in regard to trauma informed care or motivational interviewing deficiencies. Exit surveys, PLE and a coordinated admission procedure with safety protocols and yearly outcome evaluations were developed to pinpoint systemic obstacles. DV flow analysis, employing utilization of the DV comparable database, CES, APR, and LSA from the initial point of contact until permanent residence. Proactive steps like advocacy between institutions build awareness and common protocols clear the way for survivors to comply. Evaluation of calls to crisis lines and the system capacity to respond helps target the location of needed resources. Intentional geographic planning and resource development help prioritize appropriate distribution of key resources or stimulate interagency coordination.

1C-6.	Addressing the Needs of Lesbian, Gay, Bisexual, Transgender and Queer+—Anti-Discrimination Policy and Equal Access Trainings.	
	NOFO Section V.B.1.f.	

1.	Did your CoC implement a written CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination?	Yes
2.	Did your CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	Yes
3.	Did your CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs (Gender Identity Final Rule)?	Yes

1C-6a.	Anti-Discrimination Policy—Updating Policies—Assisting Providers—Evaluating Compliance—Addressing Noncompliance.	
	NOFO Section V.B.1.f.	

Describe in the field below:

1.	how your CoC regularly collaborates with LGBTQ+ and other organizations to update its CoC-wide anti-discrimination policy, as necessary to ensure all housing and services provided in the CoC are trauma-informed and able to meet the needs of LGBTQ+ individuals and families;
2.	how your CoC assisted housing and services providers in developing project-level anti-discrimination policies that are consistent with the CoC-wide anti-discrimination policy;

3.	your CoC's process for evaluating compliance with your CoC's anti-discrimination policies; and
4.	your CoC's process for addressing noncompliance with your CoC's anti-discrimination policies.

(limit 2,500 characters)

1. CoC guides community collaboration through on-going training on Anti-discrimination Act, Equal access implementation strategies, resources, equity assessment reports, and data collection. These methods empower community members to voice concerns, ask questions, make suggestions, and explore options in light of the regulations, HUD advisories, and CPD notices. Subject matter experts and PLE who are often marginalized (BIPOC, LGBTQ, seniors, persons with disability) are poised to suggest policy adjustments and build awareness of unique needs. Feedback is received through stakeholders/ CoC meetings and groups like the Youth Advisory Board, or the Ad Hoc Committee Addressing Homelessness Among Black San Diegans. Voices on PLE help to tailor practices to ensure inclusion. Consumer Rights are publicly posted.

2 The CoC offers resources to assist in engaging providers with federal and more extensive State regulations, and CoC Standards such as a Self-Assessment Tool, an equal-access decision-making tree authored by HUD CPD, access to sample documents, recommendations for public posting of policies, case examples of staff, worker and contractor empowering vs discriminatory actions, and practical tips for designing and implementing environments that are non-discriminatory. Response to issues such as gender identity, prohibitions on family separation, the rights and responsibilities of all HUD-funded projects, and clear policies protecting the right to equal access to safe housing that do not further isolate or place burden on persons in protected classes is emphasized. Suggestions are offered for each phase of the process—from outreach through housing placement and follow-up.

3. Policy compliance is part of program monitoring: documents informing the public of rights and agency policies; sampling of CES referrals vs. acceptance rates for persons in protected classes; client feedback and consumer surveys. A checklist to review program features/agency policies provided in advance is used for self-assessment. Projects are asked to report formal complaints received from clients and actions taken to resolve issues raised. Furthering Equity Report Annual reports delve into outcomes and corrective actions on equal access, discrimination and staff composition.

4 Non-compliant agencies are: advised of the rules and findings, required to offer a corrective action plan with specific remedies, referred to advocacy and education resources, and subject to legal action.

1C-7.	Public Housing Agencies within Your CoC's Geographic Area—New Admissions—General/Limited Preference—Moving On Strategy.	
	NOFO Section V.B.1.g.	

You must upload the PHA Homeless Preference\PHA Moving On Preference attachment(s) to the 4B. Attachments Screen.

Enter information in the chart below for the two largest PHAs highlighted in gray on the current CoC-PHA Crosswalk Report or the two PHAs your CoC has a working relationship with—if there is only one PHA in your CoC's geographic area, provide information on the one:

Public Housing Agency Name	Enter the Percent of New Admissions into Public Housing or Housing Choice Voucher Program During FY 2023 who were experiencing homelessness at entry	Does the PHA have a General or Limited Homeless Preference?	Does the PHA have a Preference for current PSH program participants no longer needing intensive supportive services, e.g., Moving On?
San Diego Housing Commission	78%	Yes-Both	Yes
Housing Authority of the County of San Diego	65%	Yes-Both	No

1C-7a.	Written Policies on Homeless Admission Preferences with PHAs.	
	NOFO Section V.B.1.g.	

	Describe in the field below:
1.	steps your CoC has taken, with the two largest PHAs within your CoC's geographic area or the two PHAs your CoC has working relationships with, to adopt a homeless admission preference—if your CoC only has one PHA within its geographic area, you may respond for the one; or
2.	state that your CoC has not worked with the PHAs in its geographic area to adopt a homeless admission preference.

(limit 2,500 characters)

1. CoC worked with PHAs to create formal partnerships, leverage housing resources, and development preferences and set-asides. General and limited preferences for CoC agency referrals also elevates the link for homeless persons including HCDS' special limited preference for 1,000 HH. PHA inclusion on the CoC Board and committees ensures ongoing action to increase access to PH supports and relevant services. Carlsbad has both general and limited preferences. Formal agreements with Carlsbad Housing department leverage 30 units for CoC projects; the SDHC MTW 2025 Amended Plan includes 45 vouchers reserved for its moving-on strategy; and units in new PHA developments are reserved for homeless persons (Wakeland/PATH). The RTFH and SDHC jointly developed a strategic plan to address homelessness. RTFH and PHAs engage in planning through joint participation on several committees, and community efforts to foster access to an array of housing options. The CoC and SDHC work to create Innovative policies, waivers, and homeless and very low or zero income, and homeless targeting in specialty programs. CoC and PHAs cooperate on VASH, homeless youth, and VAWA in implementation. PHA rules require participation in CES and HMIS for specialty programs. PHA name RTFH and host a RTFH limited preference in their policies and procedures.
2. Not applicable, the CoC continues to work with all PHAs in the region.

1C-7b.	Moving On Strategy with Affordable Housing Providers.	
	Not Scored—For Information Only	

Select yes or no in the chart below to indicate affordable housing providers in your CoC's jurisdiction that your recipients use to move program participants to other subsidized housing:

1.	Multifamily assisted housing owners	Yes
2.	PHA	Yes
3.	Low Income Housing Tax Credit (LIHTC) developments	Yes
4.	Local low-income housing programs	Yes
	Other (limit 150 characters)	
5.	Private Foundation Programs such as Funder's Together and Yes in God's Back Yard and a Shared Housing initiative	Yes

1C-7c.	Include Units from PHA Administered Programs in Your CoC's Coordinated Entry.	
	NOFO Section V.B.1.g.	

In the chart below, indicate if your CoC includes units from the following PHA programs in your CoC's coordinated entry process:

1.	Emergency Housing Vouchers (EHV)	Yes
2.	Family Unification Program (FUP)	Yes
3.	Housing Choice Voucher (HCV)	Yes
4.	HUD-Veterans Affairs Supportive Housing (HUD-VASH)	Yes
5.	Mainstream Vouchers	Yes
6.	Non-Elderly Disabled (NED) Vouchers	No
7.	Public Housing	Yes
8.	Other Units from PHAs:	
	Units funded by State homeless assistance programs..	Yes

1C-7d.	Submitting CoC and PHA Joint Applications for Funding for People Experiencing Homelessness.	
	NOFO Section V.B.1.g.	

1.	Did your CoC coordinate with a PHA(s) to submit a competitive joint application(s) for funding or jointly implement a competitive project serving individuals or families experiencing homelessness (e.g., applications for mainstream vouchers, Family Unification Program (FUP), other programs)?	Yes
		Program Funding Source
2.	Enter the type of competitive project your CoC coordinated with a PHA(s) to submit a joint application for or jointly implement.	FUP

1C-7e.	Coordinating with PHA(s) to Apply for or Implement HCV Dedicated to Homelessness Including Emergency Housing Voucher (EHV).	
	NOFO Section V.B.1.g.	

	Did your CoC coordinate with any PHA to apply for or implement funding provided for Housing Choice Vouchers dedicated to homelessness, including vouchers provided through the American Rescue Plan?	Yes
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1D. Coordination and Engagement Cont'd

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1D-1.	Preventing People Transitioning from Public Systems from Experiencing Homelessness.	
	NOFO Section V.B.1.h.	

Select yes or no in the chart below to indicate whether your CoC actively coordinates with the public systems listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs.

1.	Prisons/Jails?	Yes
2.	Health Care Facilities?	Yes
3.	Residential Care Facilities?	Yes
4.	Foster Care?	Yes

1D-2.	Housing First—Lowering Barriers to Entry.	
	NOFO Section V.B.1.i.	

1.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe Haven, and Transitional Housing projects your CoC is applying for in FY 2024 CoC Program Competition.	55
2.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe Haven, and Transitional Housing projects your CoC is applying for in FY 2024 CoC Program Competition that have adopted the Housing First approach.	55
3.	This number is a calculation of the percentage of new and renewal PSH, RRH, SSO non-Coordinated Entry, Safe Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listing in the FY 2024 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	100%

1D-2a.	Project Evaluation for Housing First Compliance.	
	NOFO Section V.B.1.i.	

You must upload the Housing First Evaluation attachment to the 4B. Attachments Screen.

Describe in the field below:

1.	how your CoC evaluates every project—where the applicant checks Housing First on their project application—to determine if they are using a Housing First approach;
2.	the list of factors and performance indicators your CoC uses during its evaluation;
3.	how your CoC regularly evaluates projects outside of your local CoC competition to ensure the projects are using a Housing First approach; and
4.	what your CoC has done to improve fidelity to Housing First.

(limit 2,500 characters)

1. New for 2024-25 CoC NOFO all renewal and new applicants must sign a commitment to operating CoC-funded project/s in accordance with the Housing First Model (HF) and are required to complete the HUD Housing First self-assessment tool. Both criteria must be met as part of the threshold review before an application can be rated and ranked. Agency documents and policy reviews assess compliance with HF core concepts and operations.
2. The Housing First Standards: Assessment Summary tab of the HUD Housing First self-assessment tool that is prepared for each program is reviewed by the Rating and Ranking Committee. They verify that the score is in the green or near 180 points. Standard review factors: * Low barrier entry, *Ensures that Specific Conditions at Entry do not exclude persons due to level of income, substance use, criminal activity, history of victimization; *Conditions related to Termination do not require additional steps (eg. Required to stay a certain period, complete services, a period of sobriety); do not terminate for failure to participate in services, or failure to make progress on a service plan or income-related conditions, do not include activities in the lease agreement that are not typical, do not terminate for activities not included in a typical lease; * Allows participants to determine what assistance they want (ie. participation in supportive services is not required).
- 3.CoC Monitoring assesses HF documents and agency annual performance reports to assess if services are provided to a full array of eligible clients. CES is able to track referrals and rejections. CoC agencies are encouraged to complete the HUD HF- tool and provide a copy during monitoring. Periodic collection of client feedback adds to HF fidelity review. Client feedback through Kiosk surveys, and complaints augment the formal processes.
4. Training and Periodic Reviews: The CoC training on HF implementation and multiple tools to assess agency staff and volunteer understanding of HF policies and actions. Performance Improvement Plans include Housing First when warranted. If a program receives more than 2 PIPs that include HF fidelity the CoC implements a PIP reallocation policy. On-site and remote monitoring includes additional HF factors to ensure that written protocols are followed. To assist agencies in HF, the CoC offers training via Membership meetings and online material and encourages gathering feedback from clients, staff, and volunteers.

1D-3.	Street Outreach—Data—Reaching People Least Likely to Request Assistance.	
	NOFO Section V.B.1.j.	
	Describe in the field below how your CoC tailored its street outreach to people experiencing homelessness who are least likely to request assistance.	

(limit 2,500 characters)

With a trauma-informed approach and staff with lived experience, our Outreach teams establish a consistent presence to build trust within the community. Multi-Disciplinary Outreach teams, consisting of nurse practitioners, psychologists, clinical workers, and veterinarians, provide street-based medical services. These teams cover all areas, including remote locations like riverbeds and canyons. By assigning teams to specific geographic areas with routine routes, the CoC ensures that every individual is identified and engaged. Public libraries play a crucial role, with trained staff helping individuals access the homeless emergency response system and available resources. Once individuals are ready to engage, tailored assessments link them to the right services, and Outreach provides transportation when needed. For those facing barriers such as aging, mobility issues, health concerns, sensory impairments, pets, or worries about loved ones, the Outreach team offers a range of services including housing assessments, substance use disorder screenings, street medicine, behavioral health support, crisis intervention, vaccinations, and assistance with IDs, VA benefits, SSI, nursing facilities, safe parking, family reunification, and MediCal. Information is made accessible in multiple formats, including large print, sign language, Braille, and more.

1D-4.	Strategies to Prevent Criminalization of Homelessness.	
	NOFO Section V.B.1.k.	

Select yes or no in the chart below to indicate your CoC's strategies to prevent the criminalization of homelessness in your CoC's geographic area:

Your CoC's Strategies	Engaged/Educated Legislators and Policymakers	Implemented Laws/Policies/Practices that Prevent Criminalization of Homelessness
1. Increase utilization of co-responder responses or social services-led responses over law enforcement responses to people experiencing homelessness?	Yes	Yes
2. Minimize use of law enforcement to enforce bans on public sleeping, public camping, or carrying out basic life functions in public places?	Yes	Yes
3. Avoid imposing criminal sanctions, including fines, fees, and incarceration for public sleeping, public camping, and carrying out basic life functions in public places?	Yes	Yes
4. Other:(limit 500 characters)		
RTFH developed standards to addressing encampments and unsheltered population. These standards were reviewed and approved in partnership with law enforcement. RTFH engages with law enforcement at least annually to review outreach and engagement standards. The CoC Board includes law enforcement and city officials, who understand there are standards and a Regional Plan by which criminalization of homelessness is not a best-practice or supported by the CoC.	Yes	Yes

1D-5.	Rapid Rehousing-RRH Beds as Reported in the Housing Inventory Count (HIC) or Longitudinal Data from HMIS.	
	NOFO Section V.B.1.i.	

		HIC Longitudinal HMIS Data	2023	2024
	Enter the total number of RRH beds available to serve all populations as reported in the HIC or the number of households served per longitudinal HMIS data, e.g., APR.	Longitudinal HMIS Data	2,220	2,198

1D-6.	Mainstream Benefits—CoC Annual Training of Project Staff.	
	NOFO Section V.B.1.m.	

Indicate in the chart below whether your CoC trains program staff annually on the following mainstream benefits available for program participants within your CoC's geographic area:

	Mainstream Benefits	CoC Provides Annual Training?
1.	Food Stamps	Yes
2.	SSI—Supplemental Security Income	Yes
3.	SSDI—Social Security Disability Insurance	Yes
4.	TANF—Temporary Assistance for Needy Families	Yes
5.	Substance Use Disorder Programs	Yes
6.	Employment Assistance Programs	Yes
7.	Other (limit 150 characters)	
	SOAR Program, Public Health Assistance-Emergency Response, Mental Health services ACI assistance	Yes

1D-6a.	Information and Training on Mainstream Benefits and Other Assistance.	
	NOFO Section V.B.1.m	

Describe in the field below how your CoC:

1.	works with projects to collaborate with healthcare organizations, including those that provide substance use disorder treatment and mental health treatment, to assist program participants with receiving healthcare services, including Medicaid; and
2.	promotes SSI/SSDI Outreach, Access, and Recovery (SOAR) certification of program staff.

(limit 2,500 characters)

1. Representatives of County Health and Human Services Agency (HHSA), Housing and Community Development Services, the Hospital Association, VA, and Mental Health representatives use CoC meetings to update the Board and homeless service providers on training, policy changes and resources. CoC Leadership are active with HHSA's Whole Person Wellness program. RTFH-hosted monthly CoC general membership meetings with attendance of 100+ offers training and up-to-date information on mainstream resources provided by County or state agencies. A website 'Get Help' tab links to mainstream resources. County DPH presents monthly on health issues. The City of San Diego Homelessness Response Center (HRC) helps individuals and families experiencing homelessness on their path to permanent or longer-term housing through onsite services including; CalWORKS enrollment, Cal Fresh, and MediCal, General Relief programs, Family services programs, Local benefits, and clothing and food resources. HHSA's Whole Person Care is longterm care coordination for homeless Medi-Cal recipients who are high utilizers of hospitals and emergency departments or have other high needs such as a serious mental illness, substance use or chronic physical health conditions. WPC is designed to improve the health of high-risk, high-utilizing patients through the coordinated delivery of physical health, behavioral health, housing support, food stability, and other critical community services. CoC is working with Managed Care plans on the state of CA, CalAIM expansion and direction to serve more homeless with housing-focused resources: housing navigation, transportation, street-based medicine, transportation, etc. The CoC and County Public Health ensure monthly public health updates at general membership and board meetings on infectious disease and other public health issues and information. The CoC uses regular e-mail blasts to over 1500, uses Facebook, Twitter and a CoC newsletter to offer updates or note available training.

2. RTFH as CoC lead, funds SOAR-certified anchor agencies in subregions with state funds to provide critical SOAR support to our system of care. SOAR information and training is offered at Membership meetings and by anchor agencies. The benefits of SOAR: quick approval, reduced denial rate, and appeals support motivate agencies to engage SOAR for clients.

ID-7.	Partnerships with Public Health Agencies—Collaborating to Respond to and Prevent the Spread of Infectious Diseases.	
	NOFO Section V.B.1.n.	
	Describe in the field below how your CoC effectively collaborates with state and local public health agencies to develop CoC-wide policies and procedures that:	
1.	respond to infectious disease outbreaks; and	
2.	prevent infectious disease outbreaks among people experiencing homelessness.	

(limit 2,500 characters)

1.A strong partnership between the CoC and local public health agencies offers a robust system for preventing and responding to infectious diseases (COVID, Monkeypox, TB, Hep A, Measles). The RTFH engages the County's Public Health Department and healthcare agencies to create a multi-faceted approach tailored to the needs of people experiencing homelessness. The strategy includes prevention, detection, education, and response measures in congregate settings and expanding housing isolation options. Outreach efforts target individuals on the streets, in encampments, and in vehicles, addressing service reluctance, behavioral health challenges, social isolation, and a lack of hygiene resources. Various funding sources—ESG, CARES, CDBG, PHA, state, and CoC funds are leveraged to respond to Safety briefings, PPE distribution, on-site vaccinations, public health updates, and wide-reaching information campaigns ensure broad coverage. Expanded outreach, mobile healthcare services, and non-congregate shelters bolstered response capabilities. Key tools like teleconferences, health education, vaccine clinics, and data-sharing protocols developed during the COVID-19 pandemic have been adapted for responses to other outbreaks, such as Monkeypox. An MOU with Public Health facilitates tracking and tracing via HMIS, ensuring client records are flagged for follow-up when necessary.

2.Early detection and quick intervention are essential to preventing the spread of infectious diseases. The CoC, in collaboration with public health partners, has distributed thermometers, hygiene kits, PPE, and information through outreach teams and agencies. Handwashing stations and portable restrooms were installed in high-traffic areas and encampments, including those in unincorporated regions. The Epidemiology Unit of Public Health Services provides critical links with shelters, issuing alerts when conditions require action. Additionally, the system ensures access to meals, showers, bathrooms, laundry services, case management, and housing navigation. Ongoing support from county mental and behavioral health services, healthcare screenings, and CDC guidance continues to protect homeless individuals from heightened risk of exposure.

ID-7a.	Collaboration With Public Health Agencies on Infectious Diseases.	
	NOFO Section V.B.1.n.	
	Describe in the field below how your CoC:	
	1. effectively shared information related to public health measures and homelessness; and	
	2. facilitated communication between public health agencies and homeless service providers to ensure street outreach providers and shelter and housing providers are equipped to prevent or limit infectious disease outbreaks among program participants.	

(limit 2,500 characters)

1. The County of San Diego Health and Human Services collaborates with the CoC through an agreement in which the County's Public Health Officer delivers up-to-date guidance on infectious diseases like COVID-19, Monkeypox, TB, Measles, or Shigella during the CoC's monthly General Membership meetings and bi-monthly CoC Advisory Board sessions. Updates include case numbers, hospitalizations, deaths, and demographic information specific to people experiencing homelessness. Guidance covers where and when to get vaccinated, quarantine protocols for infected individuals, and how shelter providers can identify symptoms and implement safety procedures. Urgent updates are distributed through the CoC's listserv, which reaches over 1,500 contacts. Agencies are briefed on coordination efforts with Public Health, including an Memorandum of Agreement (MOA) that outlines how alerts within the HMIS system can track exposure and assist with contact tracing when necessary. Collaboration between HMIS administrators and public health ensures timely cross-referencing of client records, with alerts signaling staff to connect clients with necessary public health follow-up or services.

2. The response to COVID fostered consistent monthly structured communication between Public Health and CoC service providers. The County Street Health Program models the CoC-wide collaboration between service providers, health plans, and other key stakeholders to offer medical care to people living on the streets or in shelters, vaccinations for infectious diseases, distribution of hygiene kits, and transportation to non-congregate shelters or hospitals as needed. Working closely with HMIS administrators, public health officials can cross-reference client records when necessary, and alerts notify agency staff to connect clients with public health resources for follow-up care. Street outreach workers use HMIS to update client records and receive alerts related to the individuals they work with. These alerts, visible to any agency connected to the client, can be entered by Public Health nurses, staff, or HMIS coordinators, ensuring that critical information is accessible for ongoing care and intervention. CoC-facilitated meetings offer regular contact between public health personnel and CoC agency staff and periodic training arms providers with detection and intervention strategies as well as sharing program features designed to reduce risk and control outbreaks.

1D-8.	Coordinated Entry Standard Processes.	
	NOFO Section V.B.1.o.	

	Describe in the field below how your CoC's coordinated entry system:
1.	can serve everybody regardless of where they are located within your CoC's geographic area;
2.	uses a standardized assessment process to achieve fair, equitable, and equal access to housing and services within your CoC;
3.	collects personal information in a trauma-informed way; and
4.	is updated at least annually using feedback received from participating projects and households that participated in coordinated entry.

(limit 2,500 characters)

1. The Coordinated Entry system covers 100% of the CoC geographic area, includes centralized assessment and referral locations, call-in assistance through 2-1-1, direct CoC contact, intake and access points in each subregion, and outreach teams assigned to different zones with access to CES. The website landing page links to the hotline and other information about CoC services. Public websites, street outreach, resource centers, schools, service agencies, notices at emergency sites, law enforcement, and health centers augment information shared by 2-1-1. Regional Outreach Meetings build initiatives for high-demand areas, and develop targeted outreach. Encampment maps support focused, specialized outreach regionwide. GEO mapping function in HMIS can target areas where vulnerable people vulnerable, are least likely to seek services, or who rarely “touch” the system.

2. A locally developed CES standardized assessment tool and process allows for prioritization in both a common and population-focused manner. The assessment includes only part of its score from the VI-SPDAT. The majority of the score comes from questions outlined in the CES protocols. Clients in need of long-term housing solution are assessed to determine eligibility for CoC resources. Once assessed, they’re prioritized for housing opportunities for resources available through the coordinated entry system. The prioritization tool, developed by the CES Working Group and PLE, produces a score from characteristics such as chronic status, length of time homeless, current living situation, population type and disability status. Results of CES assessment place people on a By Name List which is regularly assessed by a cross-sector CES Working Group.

3. Life on the street is traumatic. Sometimes control of personal information is all a person has left. Outreach and assessment staff are responsible for protecting the person’s dignity and being aware of the impact of trauma. To minimize stress and honor control, where and when information is gathered adapts to what’s most comfortable for the person. Person-centered relationship-building rests of trust, support, and respecting client choice. PLE help engage and inform approaches to subgroup needs and characteristics. Privacy and safety are paramount.

4. The CES Working Group and CoC periodic reviews assess the CES system and recommend changes for annual policy and practice. System feedback is solicited from a broad group of system users and PLE.

1D-8a.	Coordinated Entry–Program Participant-Centered Approach.	
	NOFO Section V.B.1.o.	
	Describe in the field below how your CoC’s coordinated entry system:	
1.	reaches people who are least likely to apply for homeless assistance in the absence of special outreach;	
2.	prioritizes people most in need of assistance;	
3.	ensures people most in need of assistance receive permanent housing in a timely manner, consistent with their needs and preferences; and	
4.	takes steps to reduce burdens on people seeking assistance.	

(limit 2,500 characters)

1. The CES scoring system and CES standards prioritizes those with longest history of homelessness and with severe service needs. Points on a multi-factor scoring tool help identify persons least likely to independently reach access services. Targeted outreach that includes people with lived experience, street medicine and mental health workers engage encampments, rural/isolated areas and those with disabilities that may not reach standard CES access points. Culturally and linguistic communication methods provide flexibility and a broad capacity to reach those who might not otherwise seek assistance. 2. The CES assessment tool scores vulnerability factors such as chronic status, length of time homeless, living situation, DV, sub-population, needs, and assessment points. CES's tool is comprehensive, matching the highest need to the appropriate intensive intervention. The assessment includes 10% of the score from the VI-SPDAT v.3. Client experience and history augment the score. Multiple agencies across the CoC are trained on CES to ensure easy and quick access for those in need. 3. Public websites, street outreach, VSP personnel, notices at emergency sites, law enforcement, hospitals, and health clinics are augmented by information issued by the DV Council, 2-1-1 helpline, Family Resource Centers, courts, public settings like schools, community colleges, food security organizations, and non-profit and housing organizations ensuring accessibility. Regional Homeless Outreach Meetings address best practices, build initiatives for high-demand areas, and develop targeted outreach. Encampment maps support focused, specialized outreach regionwide. A GEO function in HMIS targets outreach to people difficult to locate and less likely to seek out services or only occasionally "touch" the system. Updated tools strengthen the community's understanding, adherence to key actions, and offer current information to proactively and efficiently shift focus and support or respond to community changes. A central hub manages provider requests, offering immediate support for CES/HMIS queries, collaboration, training, and eligibility verification. 4. The assessment is phased and adapts to be trauma informed. Multiple access points offer assessment at different times. A centralized ID Bank securely stores client documents to reduce admin time for resources. Victims of violence, assault and human trafficking are informed about immediate support and emergency transfer services..

1D-8b.	Coordinated Entry–Informing Program Participants about Their Rights and Remedies–Reporting Violations.	
	NOFO Section V.B.1.o.	
	Describe in the field below how your CoC through its coordinated entry:	
	1. affirmatively markets housing and services provided within the CoC's geographic area and ensures it reaches all persons experiencing homelessness;	
	2. informs program participants of their rights and remedies available under federal, state, and local fair housing and civil rights laws; and	
	3. reports any conditions or actions that impede fair housing choice for current or prospective program participants to the jurisdiction(s) responsible for certifying consistency with the Consolidated Plan.	

(limit 2,500 characters)

1.The CoC affirmative marketing ensures everyone, regardless of race, age, gender, disability, or other factors is aware of the housing and services offered. While campaigns may seek to reach specific subpopulations (chronically homeless, veterans, families, youth, survivors, or households overrepresented in homelessness), CoC marketing is designed to reach everyone. Websites, social media, community outreach, and online access work to reach everyone. Other actions to reduce the digital divide (print media, outreach). To ensure effective communication with those with disabilities, CoC provides aids like Braille, audio, large type, and sign language interpreters. CES materials in multiple languages to reach groups with Limited English Proficiency.

2. Website Policy and Procedures include sections on Fair Housing, Nondiscrimination and Marketing. All programs receiving Federal and State funds will comply with applicable civil rights, fair housing, equal access, disability laws and notices to clients. Recipients and subrecipients of CoC Program and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws and VAWA. The CoC provides annual training on Fair Housing from the CA Civil Rights Dept. All locations where persons are likely to access or attempt to access CES (Access Points, emergency shelter, and street outreach) post signs displayed in prominent locations and/or offer guides about personal rights. How to file a discrimination complaint and contact information needed to file a complaint is included on the signs or in brochures.

3 Grievances related to discrimination are directed to the RTFH. A first-person written and/or documented complaint is considered a grievance. A verbal, secondhand or hearsay complaint is treated as a complaint. Each situation is documented for the record with date, time, program name, nature of the complaint, and action taken towards resolution. All complaints or grievances involving vulnerable adults or children are immediately referred to turned over to the appropriate authorities. All CoC-funded agencies must adopt a Policy on Nondiscrimination and Fair Housing to ensure protections and equal rights are made available to all program participants. Annual Furthering Equity Reports and monitoring review agency compliance. These protections are applied consistently to all HUD projects. An Intergovernmental Liaison shares reports to ConPlan jurisdictions.

1D-9.	Advancing Racial Equity in Homelessness—Conducting Assessment.	
	NOFO Section V.B.1.p.	

1.	Has your CoC conducted a racial disparities assessment in the last 3 years?	Yes
2.	Enter the date your CoC conducted its latest assessment for racial disparities.	05/13/2024

1D-9a.	Using Data to Determine if Racial Disparities Exist in Your CoC's Provision or Outcomes of CoC Program-Funded Homeless Assistance.	
	NOFO Section V.B.1.p.	

Describe in the field below:

1.	the data your CoC used to analyze whether any racial disparities are present in your CoC's provision or outcomes of CoC Program-funded homeless assistance; and
2.	how your CoC analyzed the data to determine whether any racial disparities are present in your CoC's provision or outcomes of CoC Program-funded homeless assistance.

(limit 2,500 characters)

1 The work to discover and respond to racial disparities included: Studies in 2018 and 2019 using the American census data, the Racial Equity Analysis Tool, followed by formal research funded by a private foundation using the information in CoC data sources (HMIS, CES records, HIC, PITC, project APRs) and public records. The Ad Hoc Committee on Homelessness Among Black San Diegans (AHABSD) conducted quantitative and qualitative research through systematic data collection and analysis, policy review, participant surveys, and extensive community engagement. A CoC Action Plan published in September 2022, offers a concise but comprehensive summary of this data analysis, other findings and a set of recommendations. The AHABSD formed a Community Engagement Subcommittee Committee (CEC) and a Data group to champion key aspects of the work. Collaboration with The Center for Budget and Policy Priorities (CBPP) and Equity in Action enriched the process. In 2021-22 the CoC also reviewed the State HDIS data system demographic and racial comparison reports for the SD CoC area..2 Each report found that BIPOC comprise a higher percent of people in homelessness (30% unsheltered, 21% sheltered) compared with the portion of the general population. (5.5%). The AHABSD fulfilled actions planned from prior reports, and enhanced community engagement, the 2022 study reports on racial disparities, systemic and personal factors tied to homelessness, important themes revealed in community forums not otherwise available, insights from persons with lived experience (PLE), geographic distribution, and policies. Additional research found that prior policies and restrictions were effectively government-sponsored segregation; disparate financial practices result in twice the number of denials for mortgage lending; housing locations are not equally distributed; shelter DNR lists create imbalance; being Black impacts access to crisis response, mainstream resources are not designed or administered effectively for Black People; and opportunities in positions of influence or leadership are limited.

1D-9b.	Implemented Strategies to Prevent or Eliminate Racial Disparities.	
	NOFO Section V.B.1.p	

Select yes or no in the chart below to indicate the strategies your CoC is using to prevent or eliminate racial disparities.

1.	Are your CoC's board and decisionmaking bodies representative of the population served in the CoC?	Yes
2.	Did your CoC identify steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC?	Yes
3.	Is your CoC expanding outreach in your CoC's geographic areas with higher concentrations of underrepresented groups?	Yes
4.	Does your CoC have communication, such as flyers, websites, or other materials, inclusive of underrepresented groups?	Yes
5.	Is your CoC training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness?	Yes

6.	Is your CoC establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector?	Yes
7.	Does your CoC have staff, committees, or other resources charged with analyzing and addressing racial disparities related to homelessness?	Yes
8.	Is your CoC educating organizations, stakeholders, boards of directors for local and national nonprofit organizations working on homelessness on the topic of creating greater racial and ethnic diversity?	Yes
9.	Did your CoC review its coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness?	Yes
10.	Is your CoC collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system?	Yes
11.	Is your CoC conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness?	Yes
	Other:(limit 500 characters)	
12.	The CoC Board includes an Ad Hoc Committee Addressing Homelessness Among Black San Diegans. The CoC Board adopted an Action Plan in 2022 and are actively engaged in implementation of this Action Plan.	Yes

1D-9c.	Plan for Ongoing Evaluation of System-level Processes, Policies, and Procedures for Racial Equity.	
	NOFO Section V.B.1.p.	

Describe in the field below your CoC's plan for ongoing evaluation of system-level processes, policies, and procedures for racial equity.

(limit 2,500 characters)

RTFH has undertaken several key initiatives. RTFH has expanded training opportunities for all staff, particularly focusing on front-line program personnel, emphasizing essential topics related to diversity, equity, and inclusion (DEI), including implicit bias, creating an equitable organizational culture, understanding the impacts of racial trauma, anti-racism, and effective responses to individuals with disabilities. RTFH is committed to reviewing agency documents to assess whether program policies, practices, and procedures are inclusive and sensitive to the diverse cultures of those seeking homeless services. Where necessary, policies will be updated to enhance inclusivity and cultural sensitivity. RTFH is actively identifying barriers to participation that underserved groups face, particularly racial, ethnic, gender, and disability-related challenges, and working to mitigate these barriers. RTFH provides training on inclusive recruitment practices aimed at enhancing the diversity of front-line staff and leadership roles; the Rating and Ranking criteria used in evaluating project applications incorporate measures of commitment to equity, inclusion, and equal access; Mapping the informal support systems provided by faith-based organizations to develop effective and culturally appropriate support services. Based on feedback from PLE and providers, RTFH, in collaboration with Equity in Action, launched a Cultural Ambassador Program. This year-long initiative aims to equip ambassadors with a foundational understanding to advocate for DEI within their organizations advancing efforts toward becoming an anti-racist CoC. RTFH and the Ad Hoc committee have evaluated racial, ethnic, and gender disparities through multiple methods, including reviewing PITC data, conducting annual performance measure evaluations, and analyzing data from HMIS and the State of California; using the HUD CoC Racial Equity Analysis Tool, examining youth coordinated entry system data, and reviewing demographic information on actively homeless youth. Insights gained from these analyses led to the formation of several committees dedicated to addressing inequities, including an Ad Hoc Committee focused on homelessness among Black San Diegans, committees for aging and homelessness, health and homelessness, and ongoing efforts to establish committees for families, youth, and justice initiatives in the upcoming year.

1D-9d.	Plan for Using Data to Track Progress on Preventing or Eliminating Racial Disparities.	
	NOFO Section V.B.1.p.	
	Describe in the field below:	
1.	the measures your CoC plans to use to continuously track progress on preventing or eliminating racial disparities in the provision or outcomes of homeless assistance; and	
2.	the tools your CoC plans to use to continuously track progress on preventing or eliminating racial disparities in the provision or outcomes of homeless assistance.	

(limit 2,500 characters)

1 Much of the data collected to describe, evaluate, and drive decision-making is quantifiable, easily lending itself to trend analysis. Expanding regular review and reporting on other data such as denial rates, do not return lists, consumer complaints, and the locations where housing and services can be accessed are routine. The CoC data, however, cannot stand alone in tracking progress on preventing and eliminating inequities that are influenced by broader systems. Meaningful cross-system data sharing with mainstream resources and other institutions is crucial to understanding and addressing disparities.

Partnering with justice systems, health and behavioral health, foster care, law enforcement, and non-HUD funded providers such as those offering crisis response to periodically assess system effectiveness and progress may be challenging but is essential to success.

External, publicly available data, like that offered through State HDIS, employment development, or population characteristics offer baselines and context for CoC tracking and analysis. Data can be filtered by multiple parameters to create custom reports readily accessible for ongoing comparison. Annual completion of the Racial Disparities Tool, Equal Access Self-Assessment, and progress on actions in the Commitment to Further equity help gauge progress.

And we must not forget the critical component of actively listening to the voices of BIPOC including those who are dually impacted as members of other marginalized groups (LGBTQ, disability, chronic, senior or youth status or ongoing health conditions), especially those with lived experience. In partnership with Equity In Action, RTFH hosts quarterly community engagement sessions regarding needs of the community. Regular mechanisms for anonymous feedback protected from potential reprisal, such as the existing consumer Kiosks, must include opportunities to address system or agency weaknesses.

2 Existing tools: RTFH Equity Data Dashboard, annual reports (HIC, PIT, systems performance); CES client tracking, aggregate reports offer ongoing, interactive analysis at both and project levels. These resources can be used to assess the composition of people living in homelessness (PLH), the housing and services provided, the effectiveness of different types of intervention; patterns of assistance; CES utilization and outcomes; or data evidencing substantive differences and potential barriers; and progress on established goals.

1D-10.	Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decisionmaking—CoC's Outreach Efforts.	
	NOFO Section V.B.1.q.	

Describe in the field below your CoC's outreach efforts (e.g., social media announcements, targeted outreach) to engage those with lived experience of homelessness in leadership roles and decisionmaking processes.

(limit 2,500 characters)

The integration of PLE is a cornerstone of the CoC's development of plans, policies, and processes. RTFH established a policy in 2021 on engaging PLE and to provide stipends. The CEO routinely meets with PLE or people living unsheltered to solicit input. These meetings take place individually and in small group settings to ensure we are meeting the needs of PLE who may not want to engage in large public settings. RTFH's development of the Regional Community Action Plan convened regional collaboratives and PLE listening sessions co-hosted with PLE board members to ensure feedback was incorporated into the final Regional Plan. RTFH brings CoC consultant and national expert on unsheltered homelessness, Iain De Jong to San Diego quarterly for in person listening and development sessions. These sessions helped to collect insight and actively listen to create better plans to address unsheltered homelessness. Kiosks in service agencies gather real-time feedback from PLE. Kiosk surveys were developed in partnership with 3 PLE. RTFH has recently expanded the kiosk program to include all providers funded by RTFH for outreach and engagement, with more than 20 kiosks collecting feedback across the region. This will enhance our ability to address more immediate needs of PLE in the coming year. CoC's Governance Charter requires a minimum of 2 PLE Board seats. Currently 5 members offer lived experience and provide diversity in Board discussions and actions. PLE Board members include justice sector, foster care and young adult, tribal representation, and unsheltered. PLE play a critical role on committees: the rank and rating, evaluation advisory committee, health and homeless committee, and aging homeless committees. RTFH also provides funding to the HEAL network and LEA who work with PLE to assist them in how to talk about their experiences; educate them on policy and practice; prepare and connect those who are interested in working in this sector. RTFH also employs PLE from entry level to leadership and also contracts directly with PLE to ensure our work is grounded in PLE. The 2023 RTFH Conference on Homelessness also provided scholarships for PLE to attend the conference and 40% of speakers were PLE.

1D-10a.	Active CoC Participation of Individuals with Lived Experience of Homelessness.	
	NOFO Section V.B.1.q.	

You must upload the Lived Experience Support Letter attachment to the 4B. Attachments Screen.

Enter in the chart below the number of people with lived experience who currently participate in your CoC under the four categories listed:

	Level of Active Participation	Number of People with Lived Experience Within the Last 7 Years or Current Program Participant	Number of People with Lived Experience Coming from Unsheltered Situations
1.	Routinely included in the decisionmaking processes related to addressing homelessness.	7	7
2.	Participate on CoC committees, subcommittees, or workgroups.	20	20
3.	Included in the development or revision of your CoC's local competition rating factors.	2	2
4.	Included in the development or revision of your CoC's coordinated entry process.	2	2

1D-10b.	Professional Development and Employment Opportunities for Individuals with Lived Experience of Homelessness.	
	NOFO Section V.B.1.q.	

Describe in the field below how your CoC or CoC membership organizations provide professional development and employment opportunities to individuals with lived experience of homelessness.

(limit 2,500 characters)

CoC opportunities for professional development include: designated seats in decision-making roles and providing coaching and support to enhance skills when fulfilling the role; mentorship; skills training; private foundation funding for 10 employment training and placement projects; classes on job seeking, resume writing help PLE focus on their strengths; OJT with stipends; a PLE support project sponsored by a funding collaborative; education and training for effectively building skills through volunteerism and internship and offering support such as child care to enable participation; developing connection with 'friendly employers' especially in demand industries who commit to helping PLE gain work or training, partnerships with educational settings, labor organizations, Able-Disabled, Black Worker Center, and All of Us or None, Veteran's Standdown, as well as direct hiring of persons with lived experience in key roles in the agencies funded by the CoC and state homeless programs. Specific attention is given to the recruitment of PLE from over-represented and vulnerable groups (BIPOC, LGBTQ, DV, youth, and persons with disabilities). YHDP subrecipients hire Youth System Navigators with lived experience to support youth in YHDP programs. Several providers have advisory boards of people with lived experience that inform decisions. Youth enrolled in YHDP and other CoC youth programs are connected to job training and employment through the Workforce Partnership Excel Program for former foster youth, Connect 2 Careers program, Timmy's Place, 8 WEST and trade school programs. They are referred to career centers, job fairs, supported in making a resume, provided interview clothing and transportation to interviews. Some providers manage social enterprises and provide training and paid positions at their coffee shops, Chef training and placements, and thrift boutiques. Agencies that provide street outreach look to hire those with lived experience and build on peer-to-peer opportunities to engage potential hires. Youth are also referred to educational, entrepreneurial and leadership training through formal partnerships identified previously.

1D-10c.	Routinely Gathering Feedback and Addressing Challenges of Individuals with Lived Experience of Homelessness.	
	NOFO Section V.B.1.q.	

Describe in the field below:

1.	how your CoC gathers feedback from people experiencing homelessness;
2.	how often your CoC gathers feedback from people experiencing homelessness;
3.	how your CoC gathers feedback from people who received assistance through the CoC Program or ESG Program;
4.	how often your CoC gathers feedback from people who have received assistance through the CoC Program or ESG Program; and

5.	steps your CoC has taken to address challenges raised by people with lived experience of homelessness.
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(limit 2,500 characters)

1 Structures and opportunities for ongoing feedback from PLE are incorporated in the CoC's Governance Charter and daily practices. 2 Board seats designated for PLE; 2 for Rating and Ranking, 2 for Evaluation Advisory Committee, 1 for Governance Subcommittee. Attention is given to ensure PLE, especially with recent history of living unsheltered or are from underserved groups, are included in Ad Hoc subcommittees, planning and development sessions, other work groups, community listening sessions and forums, and open public comment periods. Currently, 5 PLE serve on the CoC Board and offer diverse perspectives and creative actions for consideration; including representation of youth; tribe; and justice-involved.

2 The CoC gathers information on an ongoing basis through various opportunities, including anonymous feedback kiosks-Pulse For Good; CoC Board meeting every other month, with subcommittees meeting on a monthly basis; and a support ticket system, by which anyone can provide feedback or concerns. Many PLE actively engaged in Ad Hoc Committee and group work: Committee to Address Homelessness Among Black San Diegans; Health and Homelessness Subcommittee; Governance and policy advisory; Rating and Ranking; Community Planning.

3 Anonymous feedback is gathered with Pulse For Good kiosks at multiple agencies regionally. Kiosk questions are designed by PLE and seek to better understand how people feel about the services being offered; types of services being utilized; and gaps in the system/service. Automatic reports action the feedback and spurn responses to improve client experiences and help providers/funders understand client satisfaction.

4 Feedback is gathered from the broader community of PLE through periodic activities: input and listening sessions; kiosks; focus groups; community surveys; exit surveys; and consultant interviews. The fully- engaged PIT surveys yield input from over 1700 more.

5 PLE voices impact CoC actions. Examples include: Policies adopted by the Board regarding actions to reduce racial inequity; the changes in Kiosk questions and design; changes in the Furthering Equity Policy; inclusion of Equal Access Rules activities in Rating & Ranking; changes in project scoring; culturally sensitive language in distributed materials; amendments to verification forms and processes, YHDP project implementation, Youth PIT activities.

1D-11.	Increasing Affordable Housing Supply.	
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	NOFO Section V.B.1.s.	
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	Describe in the field below at least two steps your CoC has taken in the past 12 months to engage city, county, or state governments that represent your CoC's geographic area regarding the following:
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1.	reforming zoning and land use policies to permit more housing development; and
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2.	reducing regulatory barriers to housing development.
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(limit 2,500 characters)

1. CoC continues to collaborate with city, county and state partners to increase housing development. RTFH supported Mayor Gloria and the city planning team signing into law the University Community Plan, which allows for up to 29,000 new homes and transit; Hillcrest Community Plan for up to 17,200 new homes. As part of Mayor's Homes for All of Us Initiative, Mayor Gloria also signed a second Housing Action Package into law to build housing San Diegans can afford, including amendments to the Land Development Code to preserve existing affordable homes and encourage the construction of new homes; with new protections for the most vulnerable community members. RTFH also advocated with Council President Sean Elo-Rivera on ByRight development of city properties. 2. Public comment is provided at City Council and County Board of Supervisor meetings on homeless and housing-related issues, including land use and reducing barriers. RTFH met with City Councilmembers and County Supervisors throughout the year. RTFH produces a monthly report showing impacts of the high cost of housing in San Diego and is widely reviewed by local jurisdictions. RTFH testified at CA Senate subcommittee on the impacts of State funding and how the absence of funding in the Governor's budget would impact our ability to address homelessness moving forward. Other panelists include Mayor Steinberg, of Sacramento, Annalee Trujillo, Director of the Pala Band of Mission Indians/Pala Housing Resource Center, and Graham Knaus, CEO of CA State Association of Counties. RTFH spoke at the HCD committee, Chaired by Assembly member Chris Ward, on AB1932, which realigns Vacation Home Mortgage Interest deductions and create an ongoing source of revenue to support affordable housing construction; Home Ownership; and Homelessness solutions. RTFH spoke to the importance of prevention, housing navigation and landlord incentives as 25% of the funds would be dedicated to these activities. Dr. Margot Kushel, keynote speaker at the 2023 RTFH Conference on Homelessness as she provided an overview of the CA Statewide Study of People Experiencing Homelessness (CASPEH), conducted by The University of CA, San Francisco Benioff Homelessness and Housing Initiative, is the largest representative study of homelessness in the United States since the mid-1990s. The study provides a comprehensive look at the causes and consequences of homelessness in CA and recommends policy changes to shape programs in response.

1E. Project Capacity, Review, and Ranking–Local Competition

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1E-1.	Web Posting of Advance Public Notice of Your CoC's Local Competition Deadline, Scoring and Rating Criteria.	
	NOFO Section V.B.2.a. and 2.g.	

1.	Enter the date your CoC published its submission deadline and scoring and rating criteria for New Project applicants to submit their project applications for your CoC's local competition.	08/15/2024
2.	Enter the date your CoC published its submission deadline and scoring and rating criteria for Renewal Project applicants to submit their project applications for your CoC's local competition.	08/15/2024

1E-2.	Project Review and Ranking Process Your CoC Used in Its Local Competition. We use the response to this question and the response in Question 1E-2a along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section V.B.2.a., 2.b., 2.c., 2.d., and 2.e.	

You must upload the Local Competition Scoring Tool attachment to the 4B. Attachments Screen.

Select yes or no in the chart below to indicate how your CoC ranked and selected project applications during your local competition:

1.	Established total points available for each project application type.	Yes
2.	At least 33 percent of the total points were based on objective criteria for the project application (e.g., cost effectiveness, timely draws, utilization rate, match, leverage), performance data, type of population served (e.g., DV, youth, Veterans, chronic homelessness), or type of housing proposed (e.g., PSH, RRH).	Yes
3.	At least 20 percent of the total points were based on system performance criteria for the project application (e.g., exits to permanent housing destinations, retention of permanent housing, length of time homeless, returns to homelessness).	Yes
4.	Provided points for projects that addressed specific severe barriers to housing and services.	Yes
5.	Used data from comparable databases to score projects submitted by victim service providers.	Yes

6.	Provided points for projects based on the degree the projects identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and has taken or will take steps to eliminate the identified barriers.	Yes
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1E-2a.	Scored Project Forms for One Project from Your CoC's Local Competition. We use the response to this question and Question 1E-2. along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section V.B.2.a., 2.b., 2.c., and 2.d.	

You must upload the Scored Forms for One Project attachment to the 4B. Attachments Screen.

Complete the chart below to provide details of your CoC's local competition:

1.	What were the maximum number of points available for the renewal project form(s)?	120
2.	How many renewal projects did your CoC submit?	49
3.	What renewal project type did most applicants use?	PH-PSH

1E-2b.	Addressing Severe Barriers in the Local Project Review and Ranking Process.	
	NOFO Section V.B.2.d.	

Describe in the field below:

1.	how your CoC analyzed data regarding each project that has successfully housed program participants in permanent housing;
2.	how your CoC analyzed data regarding how long it takes to house people in permanent housing;
3.	how your CoC considered the specific severity of needs and vulnerabilities experienced by program participants preventing rapid placement in permanent housing or the ability to maintain permanent housing when your CoC ranked and selected projects; and
4.	the severe barriers your CoC considered.

(limit 2,500 characters)

1. A 120-point CoC review process relies on objective data: HMIS, APRs, monitoring results, ELOCCS, fiscal audits, CES, and standardized forms for Housing First, Furthering Equity. Measuring housing success considers differences in program types and client characteristics. CoC aggregates outcomes by project type, uses the average value by type, and sets benchmarks for achievement for each type. Using APR data for a calendar year (not operating years which differ) ensures parity in evaluation. PSH success examines retention and housing outcomes at exit. RRH, TH and Joint projects should move people quickly to housing, using shorter terms to gain permanency. HMIS and the DV database APRs for positive permanent housing outcomes, length of time homeless, housing retention, and returns to homelessness are compared to the benchmark for the housing type and points are awarded. Cost-effectiveness is based on cost for % of successful exits. Scoring rewards actions that increase client capacity by gaining earned income, mainstream benefits, housing first fidelity and furthering equity. Projects that meet thresholds (like match) are then rated on the same elements project design (37.5%), performance (45.8%), and barriers (16.7%) but with benchmarks set by project type. Projects serving more severe needs, or special populations (DV) are compared to ensure that those serving the hardest to serve are not penalized.
2. A similar data-driven comparative process looks at LOTH by project type and reviews trends in performance. The LOTH from 'first touch' to permanent housing seeks limited time in non-PSH. Standards for time from initial contact to placement are set by housing type.
3. Service to clients with higher need influences scoring. Scoring elements measures for severity and vulnerability of people are part of the review of both renewal projects (16.7%) and new projects. Status as DV, chronic, low or no income, street homeless, multiple disabilities, youth, seniors. New project points aligned with severe service needs, over-represented groups (BIPOC, LGBTQ, disability), and CoC gaps.
4. Criteria include client challenges and vulnerabilities: no income; multiple disabilities (2+ on APR physical, mental health, substance use); chronic, DV, senior, or youth status; equity efforts to further for over-represented or underserved persons, are considered. Benefits to the CoC, fitting plans and goals, and filling system gaps/ priorities are part of all reviews.

1E-3.	Advancing Racial Equity through Participation of Over-Represented Populations in the Local Competition Review and Ranking Process.	
	NOFO Section V.B.2.e.	
Describe in the field below:		
1.	how your CoC used input from persons of different races and ethnicities, particularly those over-represented in the local homelessness population, to determine the rating factors used to review project applications;	
2.	how your CoC included persons of different races and ethnicities, particularly those over-represented in the local homelessness population in the review, selection, and ranking process; and	
3.	how your CoC rated and ranked projects based on the degree that proposed projects identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and steps the projects took or will take to eliminate the identified barriers.	

(limit 2,500 characters)

1. Honoring persons with lived experience is a CoC strength. The CoC encourages regular, input from diverse perspectives and over-represented groups. Black, Latino, and LGBTQ, seniors, help ensure consumer voice through policies, Board and Committee seats, public kiosks and surveys, open public comment, and data to help shape our policies, including project priorities and scoring elements. Many contribute personal experiences that help shape the Annual Furthering Equity report used in evaluation. The Committee to Address Homelessness Among Black San Diegans listed areas for action that were incorporated in a Furthering Equity Policy.

2. The Rating and Ranking Group (R&R), charged with the review selection and ranking process, is racially, gender, and age diverse. Forty percent (40%) of members are Persons with Lived Experience, including persons from over-represented, under-served homeless constituencies (BIPOC, Persons with disability, PLE). R&R develops and refines scoring criteria; reviews agency performance data, Housing First documents, Furthering Equity Reports (FER), Performance Improvement Plans, and financial information. R&R scores and ranks applications; helps to massage language and frame public communications, fosters strategies for improvement, and makes recommendations for future actions. R&R Members help recruit and mentor new participants and help 'translate' regulatory and technical language into understandable terms. PLE on R&R watch and listen carefully and advocate or challenge approaches or recommended actions to ensure that the consumer voice is heard.

3 Scoring includes: A Furthering Equity Policy (FEP) requires renewal applicants to submit a FEP annual outcomes report with specific actions and outcomes. The R&R process and scoring tools include points-tied criteria clearly linked to 5 actions for Furthering Equity (FE) and an annual FE Report (FER); level of service to persons with No Income at Entrance, multiple disabilities, underserved and vulnerable groups (LGBTQ, seniors, youth) critical review of low barrier and housing first implementation; effective CES participation; when failure shows, a Performance Improvement Plan (PIP) with measurable actions to address the weaknesses identified. The CoC provides Tools for self-assessment project compliance with the Equal Access Rule, training and educational support decision-making at each step in the helping process, and material for remedying issues identified.

1E-4.	Reallocation–Reviewing Performance of Existing Projects.	
	NOFO Section V.B.2.f.	

Describe in the field below:

1.	your CoC's reallocation process, including how your CoC determined which projects are candidates for reallocation because they are low performing or less needed;
2.	whether your CoC identified any low performing or less needed projects through the process described in element 1 of this question during your CoC's local competition this year;
3.	whether your CoC reallocated any low performing or less needed projects during its local competition this year; and
4.	why your CoC did not reallocate low performing or less needed projects during its local competition this year, if applicable.

(limit 2,500 characters)

1. Reallocation embraces ongoing activities with agencies to ensure effective use of funds. Gathering data to inform reallocation begins prior to competition ranking. Data is collected during the year and compiled for ranking and reallocation decisions, Actions prior to competition: Performance Review Monitoring, system and policy compliance, and agency self-evaluation. If non-compliant with CoC policies, findings, corrective actions and best practices and resources are shared to build program strength. Low-performing projects and those not benefiting the CoC strategic plan are evaluated for redesign. Next, a threshold review ensures that the projects meet HUD and local threshold criteria. The agency is notified of any issues and if problems are correctible, or renders the application ineligible. During the competition, performance scoring and compliance reviews are core parts of reallocation. Scoring project performance across similar types of projects on objective, measurable data about housing outcomes, income, cost-effectiveness, financial audits, monitoring results, severity of needs clients served, impact on vulnerable or underserved groups, results of monitoring and fiscal audit inform scoring, and Furthering Equity actions. Agencies can elect to voluntarily reallocate part or all of the project CoC funding to best serve the community. Rating and Ranking (R&R) reviews, scores, ranks and recommends project acceptance or rejection. Using objective data and benchmarks and the published protocols R&R reviews, scores, ranks and recommends project acceptance or rejection. Projects failing to meet 55% of the full performance benchmark submit a Performance Improvement Plan (PIP) of specific actions prior to Application submitted to HUD. Progress on the PIP is required for continued funding. Involuntary Reallocation results from failing threshold review, or a project failing their PIP, or a pattern of Chronic Underspensing over three years. R&R reviews results of scoring and data, looks at unique aspects of the project (location, type of client served, less than one year of operation). Using the published protocols recommends project acceptance, rejection, or reduction. Notices of reallocation and reasons are issued.
2. Six projects are subject to Performance Improvement Plans.
3. Two renewal projects were reallocated this year.
4. N/A.

1E-4a.	Reallocation Between FY 2019 and FY 2024.	
	NOFO Section V.B.2.f.	

	Did your CoC cumulatively reallocate at least 20 percent of its ARD between FY 2019 and FY 2024?	No
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1E-5.	Projects Rejected/Reduced–Notification Outside of e-snaps.	
	NOFO Section V.B.2.g.	
	You must upload the Notification of Projects Rejected-Reduced attachment to the 4B. Attachments Screen.	

1.	Did your CoC reject any project application(s) submitted for funding during its local competition?	Yes
2.	Did your CoC reduce funding for any project application(s) submitted for funding during its local competition?	Yes
3.	Did your CoC inform applicants why your CoC rejected or reduced their project application(s) submitted for funding during its local competition?	Yes
4.	If you selected Yes for element 1 or element 2 of this question, enter the date your CoC notified applicants that their project applications were being rejected or reduced, in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2024, 06/27/2024, and 06/28/2024, then you must enter 06/28/2024.	10/10/2024

1E-5a.	Projects Accepted–Notification Outside of e-snaps.	
	NOFO Section V.B.2.g.	
	You must upload the Notification of Projects Accepted attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified project applicants that their project applications were accepted and ranked on the New and Renewal Priority Listings in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2024, 06/27/2024, and 06/28/2024, then you must enter 06/28/2024.	10/10/2024
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1E-5b.	Local Competition Selection Results for All Projects.	
	NOFO Section V.B.2.g.	
	You must upload the Local Competition Selection Results attachment to the 4B. Attachments Screen.	

	Does your attachment include: 1. Project Names; 2. Project Scores; 3. Project Status–Accepted, Rejected, Reduced Reallocated, Fully Reallocated; 4. Project Rank; 5. Amount Requested from HUD; and 6. Reallocated Funds +/-.	Yes
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1E-5c.	Web Posting of CoC-Approved Consolidated Application 2 Days Before CoC Program Competition Application Submission Deadline.	
	NOFO Section V.B.2.g. and 24 CFR 578.95.	
	You must upload the Web Posting–CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC posted the CoC-approved Consolidated Application on the CoC's website or partner's website—which included: 1. the CoC Application; and 2. Priority Listings for Reallocation forms and all New, Renewal, and Replacement Project Listings.	10/28/2024
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1E-5d.	Notification to Community Members and Key Stakeholders by Email that the CoC-Approved Consolidated Application is Posted on Website.	
	NOFO Section V.B.2.g.	

You must upload the Notification of CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.

	Enter the date your CoC notified community members and key stakeholders that the CoC-approved Consolidated Application was posted on your CoC's website or partner's website.	10/28/2024
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2A. Homeless Management Information System (HMIS) Implementation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2A-1.	HMIS Vendor.	
	Not Scored—For Information Only	

	Enter the name of the HMIS Vendor your CoC is currently using.	Bitfocus, Inc
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2A-2.	HMIS Implementation Coverage Area.	
	Not Scored—For Information Only	

	Select from dropdown menu your CoC's HMIS coverage area.	Single CoC
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2A-3.	HIC Data Submission in HDX.	
	NOFO Section V.B.3.a.	

	Enter the date your CoC submitted its 2024 HIC data into HDX.	05/07/2024
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2A-4.	Comparable Databases for DV Providers—CoC and HMIS Lead Supporting Data Collection and Data Submission by Victim Service Providers.	
	NOFO Section V.B.3.b.	

	In the field below:	
1.	describe actions your CoC and HMIS Lead have taken to ensure DV housing and service providers in your CoC collect data in HMIS comparable databases; and	
2.	state whether DV housing and service providers in your CoC are using a HUD-compliant comparable database—compliant with the FY 2024 HMIS Data Standards.	

(limit 2,500 characters)

1. The comparable DV database undergoes regular reviews to ensure compliance with HMIS standards, verify system parameters, and establish protocols for effectively generating deidentified data for aggregate reports. Each user is required to sign HMIS privacy and use policies that protect confidentiality and safeguard against security breaches. The CoC collaborates with Victim Services Providers to facilitate the proper use of comparable databases and serves as a liaison with software vendors to secure these databases. Additionally, the CoC and HMIS lead operate a helpdesk available to all agencies within the CoC, providing technical assistance to those using a comparable database. Helpdesk staff support agencies with reporting and reviewing data collection. The CoC Monitoring team examines project and performance data, while APRs provide insights into data quality that inform the rating and review process. .2. The comparable database used by DV providers complies with HUD and FY 2022 HMIS Data Standards. It collects all required data elements, including universal and project descriptive data elements, and generates necessary HUD-standard reports, such as the Annual Performance Report (APR), the Consolidated Annual Performance Evaluation Report (CAPER), the Data Quality Framework, and HUD's comma-separated values text export file.3. The CoC's HMIS adheres to the 2024 HMIS Data Standards, collecting all mandatory data elements, including universal and project descriptive data elements, and producing required HUD-standard reports such as the Annual Performance Report (APR), the Consolidated Annual Performance Evaluation Report (CAPER), the Data Quality Framework, and HUD's comma-separated values text export file. It also meets the deadlines for updating HMIS data standards.

2A-5.	Bed Coverage Rate—Using HIC, HMIS Data—CoC Merger Bonus Points.	
	NOFO Section V.B.3.c. and V.B.7.	

Using the 2024 HDX Competition Report we issued your CoC, enter data in the chart below by project type:

Project Type	Adjusted Total Year-Round, Current Non-VSP Beds [Column F of HDX Report]	Adjusted Total Year-Round, Current VSP Beds [Column K of HDX Report]	Total Year-Round, Current, HMIS Beds and VSP Beds in an HMIS Comparable Database [Column M of HDX Report]	HMIS and Comparable Database Coverage Rate [Column O of HDX Report]
1. Emergency Shelter (ES) beds	3,713	33	3,740	99.84%
2. Safe Haven (SH) beds	73	0	73	100.00%
3. Transitional Housing (TH) beds	1,921	0	1,810	94.22%
4. Rapid Re-Housing (RRH) beds	2,383	0	2,275	95.47%
5. Permanent Supportive Housing (PSH) beds	7,287	0	7,287	100.00%
6. Other Permanent Housing (OPH) beds	1,988	33	1,888	94.97%

2A-5a.	Partial Credit for Bed Coverage Rates at or Below 84.99 for Any Project Type in Question 2A-5.	
	NOFO Section V.B.3.c.	
	For each project type with a bed coverage rate that is at or below 84.99 percent in question 2A-5, describe:	
	1. steps your CoC will take over the next 12 months to increase the bed coverage rate to at least 85 percent for that project type; and	
	2. how your CoC will implement the steps described to increase bed coverage to at least 85 percent.	

(limit 2,500 characters)

Not applicable. Bed coverage for all project types exceeds 94%.

2A-6.	Longitudinal System Analysis (LSA) Submission in HDX 2.0.	
	NOFO Section V.B.3.d.	
	You must upload your CoC's FY 2024 HDX Competition Report to the 4B. Attachments Screen.	
	Did your CoC submit at least two usable LSA data files to HUD in HDX 2.0 by January 24, 2024, 11:59 p.m. EST?	Yes

2B. Continuum of Care (CoC) Point-in-Time (PIT) Count

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2B-1.	PIT Count Date.	
	NOFO Section V.B.4.a	

	Enter the date your CoC conducted its 2024 PIT count.	01/25/2024
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2B-2.	PIT Count Data—HDX Submission Date.	
	NOFO Section V.B.4.a	

	Enter the date your CoC submitted its 2024 PIT count data in HDX.	05/07/2024
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2B-3.	PIT Count—Effectively Counting Youth in Your CoC's Most Recent Unsheltered PIT Count.	
	NOFO Section V.B.4.b.	

	Describe in the field below how your CoC:
1.	engaged unaccompanied youth and youth serving organizations in your CoC's most recent PIT count planning process;
2.	worked with unaccompanied youth and youth serving organizations to select locations where homeless youth are most likely to be identified during your CoC's most recent PIT count planning process; and
3.	included youth experiencing homelessness as counters during your CoC's most recent unsheltered PIT count.

(limit 2,500 characters)

1. RTFH collaborated with Youth Count lead service providers to design the Youth Survey. Youth service providers collected feedback from youth with lived experience (LE) supported by the San Diego Youth Homelessness Consortium and identified the necessary resources for an effective Youth Count. In 2024 RTFH improved the Youth Count Training by integrating best practices for planning "Come-and-be-Counted" events and outreach activities during the week-long count. The training emphasized key topics such as engagement and safety, using the Counting US App, providing incentives and partnering with LE during both planning and implementation. Training was provided to staff and youth expected to participate. 2. RTFH collaborated with 5 youth service providers to cover the region. Youth applied various strategies in their respective regions. SDYS held focus groups with TAY at their TAY Academy Drop-in Center to review previous hotspots and identify new ones in the Central region. YMCA's YSN conducted street outreach in North County and engaged current participants. SBCS employed outreach strategies involving individuals with lived experience in South County. Home Start was the lead youth service provider for East County, utilizing counters from their existing Outreach programs. North County Lifeline covered North County, with a smaller count site at their LifeSpring Drop-In Center. Across regions, youth service providers collaborated with local outreach teams, that included multidisciplinary teams such as the Homeless Outreach Team which consists of law enforcement officers, mental and behavioral health and medical professionals. RTFH organized quarterly Regional Homeless Outreach Meetings where the PIT Coordinator trained over 100 outreach to identify regional hotspots. Youth Count leads partnered with community organizations that provide essential services, such as mobile showers and shelters for unaccompanied youth, as well as McKinney-Vento school staff to engage youth and strategically plan count activities throughout the week. 3. Youth with LE actively participated as surveyors during the Youth Count. Youth leads collaborated with current participants and other youth-serving organizations to recruit surveyors with LE. Training and stipends were offered for their participation as youth counters.

2B-4.	PIT Count–Methodology Change–CoC Merger Bonus Points.	
	NOFO Section V.B.5.a and V.B.7.c.	

	In the field below:
1.	describe any changes your CoC made to your sheltered PIT count implementation, including methodology or data quality changes between 2023 and 2024, if applicable;
2.	describe any changes your CoC made to your unsheltered PIT count implementation, including methodology or data quality changes between 2023 and 2024, if applicable;
3.	describe whether your CoC's PIT count was affected by people displaced either from a natural disaster or seeking short-term shelter or housing assistance who recently arrived in your CoCs' geographic; and
4.	describe how the changes affected your CoC's PIT count results; or
5.	state "Not Applicable" if there were no changes or if you did not conduct an unsheltered PIT count in 2024.

(limit 2,500 characters)

1. There were no changes to our sheltered PIT count for 2024. 2. The CoC's PIT unsheltered methodology has not changed. We have made improvements and expanded our reach in counting at service-based locations, which included safe parking sites and new safe sleeping count sites that came online after the 2023 PIT. RTFH also updated the use of local census tracts to include the 2020 Census Tracts. To improve our data collection and data quality efforts additional training materials around engagement and counting persons living in vehicles was created..3. Two nights before the count, San Diego experienced a severe flood that displaced over 1,200 residents and damaged at least 500 homes. San Diego Canyonlands count site typically counts individuals sleeping in riverbeds most known persons had to relocate and some encampments in local riverbeds were displaced. Individuals may have been accommodated in regular shelter beds and seasonal emergency shelter beds. San Diego is a border community, and it was reported that migrants were crossing in the thousands monthly at that time into San Diego.4. Because the floods began within days of the count, we were unable to collect data on the number of individuals who were displaced due to the flood. Information obtained came from site coordinators, homeless providers, and data that was disseminated to the public via local news sources. This storm was so significant that the City of San Diego and the Count of San Diego declared a State of Emergency. 5. N/A

2C. System Performance

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2C-1.	Reducing the Number of First Time Homeless—Risk Factors Your CoC Uses.	
	NOFO Section V.B.5.b.	
	In the field below:	
1.	describe how your CoC determined the risk factors to identify persons experiencing homelessness for the first time;	
2.	describe your CoC's strategies to address individuals and families at risk of becoming homeless; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the number of individuals and families experiencing homelessness for the first time	

(limit 2,500 characters)

1.The CoC identifies the risk factors of individuals facing homelessness by examining data from HMIS, PIT, and LSA. According to HMIS data, for every ten clients who found permanent housing, sixteen new clients experience homelessness for the first time (their initial entry into the HMIS system). HMIS is analyzing first-time homelessness by subpopulation and service providers, focusing on their initial system entry and exit destinations. However, HMIS data alone isn't sufficient to capture all the risk factors. Frontline staff, trained in diversion techniques, are essential in identifying and addressing these risk factors.2. The CoC utilizes diversion and resolution strategies to help individuals and families at risk of homelessness. By tracking where first-time homeless clients first engage with the system, the CoC can implement effective problem-solving and diversion techniques to quickly resolve housing crises without relying solely on permanent housing solutions. Services such as security deposit assistance, temporary rental aid, short-term case management, and help with application fees or utility deposits are key in diverting people from homelessness. To support these efforts, the CoC partners with multiple providers, receiving funds from HHAP for Resolution Strategies. This program offers flexible financial support, targeting households that need immediate aid to resolve their homelessness. The CoC is working with providers to launch a shared housing initiative, offering an alternative for clients who have income or a RRH match but are unable to secure housing on their own.3. Within RTFH, the Chief Data Officer manages data analysis, and the CEO oversees the broader operations. The CoC Evaluation Committee offers guidance, ensuring that the strategies align with the Regional Plan. Additionally, the CoC offers training in diversion techniques to facilitate swift transitions to secure housing solutions. They devise forward-looking strategies, synchronize state and local funds, and provide diversion training to service providers.

2C-1a.	Impact of Displaced Persons on Number of First Time Homeless.	
	NOFO Section V.B.5.b	

Was your CoC's Number of First Time Homeless [metric 5.2] affected by the number of persons seeking short-term shelter or housing assistance displaced due to:

1.	natural disasters?	No
2.	having recently arrived in your CoC's geographic area?	No

2C-2.	Reducing Length of Time Homeless—CoC's Strategy.	
	NOFO Section V.B.5.c.	

In the field below:

1.	describe your CoC's strategy to reduce the length of time individuals and persons in families remain homeless;
2.	describe how your CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the length of time individuals and families remain homeless.

(limit 2,500 characters)

1. The average length of time person remains homeless in shelters remain the same with only a one day increase from the previous year. Homeless family households specifically saw a LOTH reduction by ten days. Annual data suggests that senior and veteran subpopulations tend to stay homeless for longer periods compared to others but still there is a decrease in LOT of veteran populations. Data explored the difference by racial or ethnicity. To address this, the CoC has implemented a tool that considers the length of homelessness when prioritizing individuals for coordinated assistance. Additionally, the Ad Hoc Committee on Aging and Homelessness assesses senior data to advocate for more resources, and the Veteran's Consortium collaborates with the VA to reduce the number of homeless veterans, this includes case conferencing and managing a BNL. The CoC is an active partner for both the Veteran Consortium and County of San Diego Board of Supervisors' initiative to reach functional zero for veterans within two years. The CoC engages with service providers for better data quality by closing program enrollment as soon as clients leave their program.

2. The CoC conducted an in-depth analysis of HMIS data, along with federal reports such as SPM and LSA, enhanced by Stella visualizations and other custom reports. The goal was to identify subpopulations experiencing prolonged periods of homelessness. This comprehensive analysis helped pinpoint individuals and families enduring extended homelessness. By considering the duration of homelessness alongside other factors, the CoC can more effectively match clients with appropriate housing resources through CES referrals.

3. At RTFH, the Chief Data Officer handles data analysis, while the CEO oversees the operations. The CoC Evaluation Committee provides guidance to ensure strategies are in line with the larger Regional Plan. To improve data accuracy and address the issue more effectively, the CoC offers training sessions on data quality and practices that aim to reduce the length of an individual's homelessness.

2C-3.	Successful Permanent Housing Placement or Retention –CoC's Strategy.	
	NOFO Section V.B.5.d.	

In the field below:

1.	describe your CoC's strategy to increase the rate that individuals and persons in families residing in emergency shelter, safe havens, transitional housing, and rapid rehousing exit to permanent housing destinations;
2.	describe your CoC's strategy to increase the rate that individuals and persons in families residing in permanent housing projects retain their permanent housing or exit to permanent housing destinations; and
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to increase the rate that individuals and families exit to or retain permanent housing.

(limit 2,500 characters)

1. Metric 7.a.1 shows that exits from street outreach to permanent housing (PH) reached 24%, a slight improvement over the previous year, while Metric 7b.2 reflects a consistent high-performance rate of 96% for exits or retention in PH. Exits to permanent destinations from shelters and RRH also saw a small increase compared to the previous year. The CoC's strategy prioritizes the most vulnerable households, with RRH used to support placements in the least restrictive environments, which may affect initial success rates and sometimes necessitate a 'second chance' for successful outcomes. The CoC prioritization tool assesses various data points to identify and refer these households for coordinated entry referrals. Service providers receive training in diversion to assess client needs and guide them to resources that can end their homelessness. The CoC also employs trained Regional Outreach Coordinators who ensure effective outreach across the region, providing training based on the Community Outreach Standards. In partnership with private landlords, the RTFH leverages programs like FHP and Brilliant Corners to secure housing units, collaborating with CES and other service providers to engage landlords and increase housing placements and permanent exits. 2. The CoC provides training sessions for service providers on housing-centered approaches, including the "housing first" model and harm reduction strategies. These trainings are offered through general membership meetings, the annual RTFH conference, and various community events. The CoC regularly reviews key policies and standards, such as CES procedures, RRH operations, and emergency transfer guidelines, to ensure that clients in permanent housing remain stably housed. Additionally, the CoC collaborates with local public housing authorities to leverage mainstream affordable housing resources for individuals experiencing homelessness. 3. Within RTFH, the Chief Data Officer handles analysis while the CEO provides overall oversight. The CoC Evaluation Committee provides guidance, ensuring strategies align with the broader Regional Plan.

2C-4.	Reducing Returns to Homelessness—CoC's Strategy.	
	NOFO Section V.B.5.e.	
	In the field below:	
1.	describe your CoC's strategy to identify individuals and families who return to homelessness;	
2.	describe your CoC's strategy to reduce the rate that individuals and families return to homelessness; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the rate individuals and persons in families return to homelessness.	

(limit 2,500 characters)

1. The CoC tracks individuals who return to homelessness using custom HMIS and SPM reports. For families, they utilize LSA reports. The HMIS team analyzes this data to categorize those returning to homelessness within specific time frames: within 6 months, 6 to 12 months, 12 to 24 months, and 24 to 36 months. This categorization aids in understanding the potential duration before a client might become homeless again. 2. The CoC has adopted several strategies to reduce the number of individuals returning to homelessness: (a) Tailored Assistance: The CoC focuses on providing customized support to meet each household's specific needs. Partnerships with key providers enable the allocation of funds for services like diversion or other specialized aids that clients may require. Additionally, the CoC is leveraging the California Advancing and Innovating Medi-Cal (CalAIM) initiative. As this initiative will provide enhanced health services for homeless Medi-Cal beneficiaries, offering resources such as housing transition assistance and tenancy support. The goal is to combine these new services with existing ones to strengthen housing stability. (b) Expanding Housing Units: In partnership with Brilliant Corners, the CoC is working to recruit private landlords to expand the availability of permanent housing units for CES referrals. This ongoing initiative aims to build and sustain long-term relationships with local landlords, ensuring a growing supply of housing for homeless individuals. (c) Strengthening Rapid Re-Housing (RRH) Skills: The CoC is committed to enhancing the effectiveness of rapid re-housing through specialized training. RRH learning groups and a shared housing learning collaborative help providers adopt best practices in RRH. Providers also analyze program data to promote a peer-learning culture, with the culmination of these efforts being the development of the Rapid Rehousing Operating Standards. 3. Within RTFH, the Chief Data Officer is entrusted with data analysis, while the CEO supervises overall operations. The CoC Evaluation Committee offers guidance, ensuring all strategies resonate with the broader Regional Plan.

2C-5.	Increasing Employment Cash Income—CoC's Strategy.	
	NOFO Section V.B.5.f.	
	In the field below:	
1.	describe your CoC's strategy to access employment cash sources;	
2.	describe how your CoC works with mainstream employment organizations to help individuals and families experiencing homelessness increase their employment cash income; and	
3.	provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase income from employment.	

(limit 2,500 characters)

1.The CoC's comprehensive approach supports agencies like PSH, SH, and DV providers in delivering employment-related programs and job-search training to their clients. Clients develop personalized Housing Stability Plans that detail their goals related to employment, education, and increasing their income. To assist clients in improving their income, the CoC encourages providers by: implementing a points-based system in NOFO scoring, providing stipends to individuals with lived experience who participate in committees and promoting hiring within service organizations. A local foundation funds employment training, conducts research on the link between employment, income, and housing outcomes for CoC participants. Various initiatives, including PSH, have established nearly 20 partnerships with employers and job training organizations, spanning private businesses, public agencies, staffing firms, training centers, and vocational programs. SDYS, a youth provider, has developed and championed the "three E's" strategy—Employment, Education, and Entrepreneurship—as a pathway to independence and stability. The program helps youth overcome barriers stemming from limited educational and work experience. The CoC introduced new initiatives that provide shallow subsidies and direct financial assistance for related activities.2. The CoC consistently shares information about job fairs and employment opportunities with its network of over 1,500 contacts via email. To maintain a unified strategy, the CoC partners with organizations such as Workforce Partnership, San Diego Promise Zone, and the Local Initiative Support Corporation, all of which provide employment training. The RTFH has collaborated with Live Well San Diego, the Center for Employment Opportunities, and All of Us or None to assist individuals with criminal records or those involved in the justice system in securing employment. Additionally, the Council for Supplier Diversity (CSD) has teamed up with the CoC on the YHDP initiative. CSD aims to foster economic growth in marginalized communities while expanding opportunities for businesses owned by women, minorities, and service-disabled veterans. The Youth Entrepreneur Academy offers education to young people from underserved areas, teaching them how to start their own businesses. 3. Both the CoC Lead and the CoC Evaluation committee offer guidance, ensuring all strategies align perfectly with the Regional Plan.

2C-5a.	Increasing Non-employment Cash Income—CoC's Strategy	
	NOFO Section V.B.5.f.	
	In the field below:	
	1. describe your CoC's strategy to access non-employment cash income; and	
	2. provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase non-employment cash income.	

(limit 2,500 characters)

1. To explore alternative income sources beyond employment, the CoC advocates for the SSI/SSDI Outreach Access and Recovery (SOAR) program, which assists clients in obtaining benefits or navigating the unemployment process. Free legal aid services are available to all sub-populations, providing assistance with child support and alimony claims. Staff from the County HHSA deliver presentations on mainstream resources and how to access them. Additionally, the CoC's website offers extensive information on resources available through local public, private, and state organizations. Dreams for Change also provides complimentary tax assistance and financial literacy programs.

2. The RTFH, acting as the Collaborative Applicant, assigns specific responsibilities to its staff. The CoC Program Manager is responsible for ensuring that training and information are distributed throughout the region and the Chief Program Officer supervises and assesses these initiatives

3A. Coordination with Housing and Healthcare

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3A-1.	New PH-PSH/PH-RRH Project–Leveraging Housing Resources.	
	NOFO Section V.B.6.a.	
	You must upload the Housing Leveraging Commitment attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses housing subsidies or subsidized housing units which are not funded through the CoC or ESG Programs to help individuals and families experiencing homelessness?	Yes
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3A-2.	New PH-PSH/PH-RRH Project–Leveraging Healthcare Resources.	
	NOFO Section V.B.6.b.	
	You must upload the Healthcare Formal Agreements attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses healthcare resources to help individuals and families experiencing homelessness?	Yes
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3A-3.	Leveraging Housing/Healthcare Resources–List of Projects.	
	NOFO Sections V.B.6.a. and V.B.6.b.	

If you selected yes to questions 3A-1. or 3A-2., use the list feature icon to enter information about each project application you intend for HUD to evaluate to determine if they meet the criteria.

Project Name	Project Type	Rank Number	Leverage Type
Carlsbad RRH Expa...	PH-RRH	51	Housing
PATH Rapid Rehousing	PH-RRH	53	Both
Abbott Street	PH-PSH	52	Housing

3A-3. List of Projects.

1. What is the name of the new project? Carlsbad RRH Expansion

2. Enter the Unique Entity Identifier (UEI): LR6NGYMWXXJ5

3. Select the new project type: PH-RRH

4. Enter the rank number of the project on your CoC's Priority Listing: 51

5. Select the type of leverage: Housing

3A-3. List of Projects.

1. What is the name of the new project? PATH Rapid Rehousing

2. Enter the Unique Entity Identifier (UEI): J8T8GCB291E9

3. Select the new project type: PH-RRH

4. Enter the rank number of the project on your CoC's Priority Listing: 53

5. Select the type of leverage: Both

3A-3. List of Projects.

1. What is the name of the new project? Abbott Street

2. Enter the Unique Entity Identifier (UEI): D6W265AMGM53

3. Select the new project type: PH-PSH

4. Enter the rank number of the project on your 52
CoC's Priority Listing:

5. Select the type of leverage: Housing

3B. New Projects With Rehabilitation/New Construction Costs

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3B-1.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section V.B.1.r.	

Is your CoC requesting funding for any new project application requesting \$200,000 or more in funding for housing rehabilitation or new construction?	No
--	----

3B-2.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section V.B.1.r.	

	If you answered yes to question 3B-1, describe in the field below actions CoC Program-funded project applicants will take to comply with:
1.	Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u); and
2.	HUD's implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very-low-income persons, as well as contracting and other economic opportunities for businesses that provide economic opportunities to low- and very-low-income persons.

(limit 2,500 characters)

No projects in the application are requesting CoC funds for acquisition, rehabilitation, or new construction.

3C. Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3C-1.	Designating SSO/TH/Joint TH and PH-RRH Component Projects to Serve Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section V.F.	

	Is your CoC requesting to designate one or more of its SSO, TH, or Joint TH and PH-RRH component projects to serve families with children or youth experiencing homelessness as defined by other Federal statutes?	No
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3C-2.	Cost Effectiveness of Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section V.F.	

You must upload the Project List for Other Federal Statutes attachment to the 4B. Attachments Screen.

If you answered yes to question 3C-1, describe in the field below:

1.	how serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth than serving the homeless as defined in paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3; and
2.	how your CoC will meet requirements described in Section 427(b)(1)(F) of the Act.

(limit 2,500 characters)

Not applicable.

4A. DV Bonus Project Applicants for New DV Bonus Funding

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2024 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

4A-1.	New DV Bonus Project Applicants.	
	NOFO Section I.B.3.j.	

	Did your CoC submit one or more new project applications for DV Bonus Funding?	Yes
--	--	-----

4A-1a.	DV Bonus Project Types.	
	NOFO Section I.B.3.j.	

Select yes or no in the chart below to indicate the type(s) of new DV Bonus project(s) your CoC included in its FY 2024 Priority Listing.

	Project Type	
1.	SSO Coordinated Entry	No
2.	PH-RRH or Joint TH and PH-RRH Component	Yes

You must click "Save" after selecting Yes for element 1 SSO Coordinated Entry to view questions 4A-2, 4A-2a. and 4A-2b.

4A-3.	Data Assessing Need for New DV Bonus Housing Projects in Your CoC's Geographic Area.	
	NOFO Section I.B.3.j.(1)(c) and I.B.3.j.(3)(c)	

1.	Enter the number of survivors that need housing or services:	9,572
2.	Enter the number of survivors your CoC is currently serving:	817
3.	Unmet Need:	8,755

4A-3a.	How Your CoC Calculated Local Need for New DV Bonus Housing Projects.	
	NOFO Section I.B.3.j.(1)(c)	
	Describe in the field below:	
1.	how your CoC calculated the number of DV survivors needing housing or services in question 4A-3 element 1 and element 2; and	
2.	the data source (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects); or	
3.	if your CoC is unable to meet the needs of all survivors please explain in your response all barriers to meeting those needs.	

(limit 2,500 characters)

1. The demand for DV housing and services is measured by the number of survivors in the aggregated HMIS who requested assistance over a year (9,572) compared to APRs from the DV Database, PIT, HIC, and GIW data from the same period. Beyond the confirmed count, a DV Hotline and ETO database used by the VSP applicants, show over 4,000 calls for DV housing and crisis intervention. DV APRS numbers show 106 in TH; 159 in RRH, and 552 in Joint (256 RRH, 296 TH) Because there may be duplication of clients across the two sources, only the 9,572 are included in the calculation. The resources dedicated to DV households include 5 programs dedicated DV funding with 147 permanent (RRH) beds. The HIC shows a total 468 beds (including the 147) from the comparable database. The 17 programs on the HIC include HUD and Non-HUD funded programs in various program types: 3 emergency, 7 TH, 5 RRH, and one other permanent housing program. Emergency shelter (27 beds) reduces the transitional and permanent capacity to 441, less than 2% of the demonstrated need.

The known demographics of the 9,572 include 21% Black, 28.3 multiple race, 38% white, 7% Hispanic, 2% Asian/Asian American, and 1.5% Indigenous People, and 1% each Pacific Islanders and Middle Easterners. Because multiple race includes Black, the percentage of Black rises close to the rate of whites even though their prevalence in the community are unequal. Response must be relevant for these groups, with a need for 9,572 and limited total capacity for DV persons in full CoC system. Compared with CoC DV-dedicated HIC inventory (468) beds. The Point In Time data shows high utilization of units. This data evidences a gap for DV housing beds. This measure only includes those who requested CoC housing/services, not the number of calls or contacts made. DV services. With only 441 long-term beds, the bed gap is 9,131 and the unmet need is 8,755. (Shorter term use of some beds.)

2. Data sources include the CoC aggregated HMIS, HIC including DV comparable database numbers, APRs from VSP projects, GIW, and PIT reports. External sources: Hotline and ETO records for validating the unmet need.

3. Barriers are: Insufficient numbers levels of safe housing; unequal regional distribution of resources; affordable units located near services and schools; violence and assault even when housed and residual trauma, health issues; stigma, fear of perpetrator stalking, Nimbysm, and victim reluctance to file reports.

4A-3b.	Information About Unique Project Applicant Requesting New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)	
	Use the list feature icon to enter information on each unique project applicant applying for New PH-RRH and Joint TH and PH-RRH Component DV Bonus projects—only enter project applicant information once, regardless of how many DV Bonus projects that applicant is applying for.	
Applicant Name		
Center for Commun...		
Community Resourc...		

Project Applicants Applying for New PH-RRH and Joint TH and PH-RRH DV Bonus Projects

4A-3b.	Information About Unique Project Applicant Requesting New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)	

Enter information in the chart below on the project applicant that applied for one or more New DV Bonus housing projects included on your CoC's FY 2024 Priority Listing for New Projects:

1.	Applicant Name	Center for Community Solutions
2.	Rate of Housing Placement of DV Survivors–Percentage	95%
3.	Rate of Housing Retention of DV Survivors–Percentage	91%

4A-3b.1.	Applicant's Housing Placement and Retention Data Explanation.	
	NOFO Section I.B.3.j.(1)(d)	

For the rate of housing placement and rate of housing retention of DV survivors reported in question 4B-3b., describe in the field below:

1.	how the project applicant calculated the rate of housing placement;
2.	whether the rate for housing placement accounts for exits to safe housing destinations;
3.	how the project applicant calculated the rate of housing retention; and
4.	the data source (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects).

(limit 1,500 characters)

1)Efforts to Outcomes (ETO) by Social Solutions is a comprehensive outcome and case management tool for large nonprofits, government agencies, and community collaboratives. The platform was built to handle multiple partners, high volumes of programs, advanced security protocols, and multifaceted reporting and analytics initiatives. ETO's robust system provides infrastructure and scalability for large organizations to manage data, share information, and track progress in a secure, compliant environment. Service data and bed nights are recorded in ETO, with the number served and number of PH housing placements. This gives the placement rate. The information can be evaluate goals and measure of client's successes/barriers and needs. Client satisfaction surveys are available and encouraged to be completed and the results are entered in the ETO for evaluation purposes.

2)Yes, It accounts for exits to safe housing and the data source was based on current rental assistance projects CCS oversees.

3) Followup data in ETO helps track exits from PH to other permanent and stable housing. Periodic review of the numbers placed and who remain in PH give the retention rate.

4)The ETO comparable database for DV programs is used (as evidenced in DV-specific scoring tools) Average length of subsidy, outcome, and performance data from CCS reports to other state and local funding sources are used for cross-validation with ETO data reports.

4A-3c.	Applicant's Experience Housing DV Survivors.	
	NOFO Section I.B.3.j.(1)(d)	

	Describe in the field below how the project applicant:
1.	ensured DV survivors experiencing homelessness were quickly moved into safe affordable housing;
2.	prioritized survivors—you must address the process the project applicant used, e.g., Coordinated Entry, prioritization list, CoC's emergency transfer plan;
3.	determined survivors' supportive services needs;
4.	connected survivors to supportive services; and
5.	moved survivors from assisted housing to housing they could sustain—address housing stability after the housing subsidy ends.

(limit 2,500 characters)

1) CCS coordinates the multi-faceted, multi-agency SD High Risk Team that offers special services to move survivors to safety. CCS experts in crisis intervention, shelter, housing, and services empower survivors to choose what feels safe. Last year, CCS acted on 24/7 crisis line calls (4,076); and aided 697 survivors using its risk assessment, shelters, RRH, counseling, legal, support services, safety planning, advocacy, and training with the police. The hotline 'real time' bed vacancy data gave survivors choices for immediate safety in specialty emergency shelter, transitional housing (TH), or rapid re- housing (RRH).

2) Lethality/Risk assessment, CES protocols, and the CoC's Emergency Transfer Plan set priorities. CCS works closely with law enforcement, hospitals and community service providers in responding to the most urgent needs. Coordination ensures survivor safety and empowerment are paramount.

3) A strengths-based approach honors survivor autonomy while exploring options to improve safety. CCS knows different needs require varying levels of support. Needs assessment and client-driven, trauma-informed individualized plans drive housing and services. CCS' services span from crisis response to long-term care. Survivors can choose trauma-focused healing (counseling, therapy, child services), tangible help (food, clothing, transportation), integration services (school, job, legal) all provided by highly trained professional staff. Children receive special care (play, art or movement therapy). All services are voluntary.

4) CCS, a leader in the DV network, connects with many resources. CCS staff work closely with survivors to help to identify their goals relating to safe and secure housing, healing interventions/treatment, education, employment/income and determine the resources and steps needed to achieve these goals and maintain housing stability. CCS portfolio of outreach, prevention/diversion, crisis response, DV and sexual assault intervention, advocacy, legal, therapy, and housing, are only part of what is offered to victims.

5) RRH clients take over their units independently after self-sufficiency resources are defined. TH clients move into their own housing as soon as they have fiscal and personal ability to sustain independent living. Follow up case management/advocacy, counseling, legal services, and aftercare for a year as needed to ensure access to the resources and supports needed to maintain their housing.

4A-3d.	Applicant's Experience in Ensuring DV Survivors' Safety.	
	NOFO Section I.B.3.j.(1)(d)	
	Describe in the field below examples of how the project applicant ensured the safety and confidentiality of DV survivors experiencing homelessness by:	
1.	taking steps to ensure privacy/confidentiality during the intake and interview process to minimize potential coercion of survivors;	
2.	making determinations and placements into safe housing;	
3.	keeping survivors' information and locations confidential;	
4.	training staff on safety and confidentiality policies and practices; and	
5.	taking security measures for units (congregate or scattered site), that support survivors' physical safety and location confidentiality.	
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(limit 2,500 characters)

1) Intakes completed through CCS' 24/7 Hotline in office locations or by phone are private and secure. One-on-one counseling and legal services sessions are confidential and done in a private space, secured from being overheard. Intakes are completed one-on-one to avoid confidentiality breaches. All staff are trained on CIT and HIPPA/VAWA laws to ensure PPI is secured. Staff employ person-focused, trauma-informed, culturally relevant skills to support survivor choice and sense of safety drive decisions. Staff know and avoid power dynamics that stifle client action and empowerment. All documents remain with staff or are kept in a locked file behind lockable doors.

2) CCS utilizes an assessment process that allows survivors to identify what is safe for them and provides multiple options to ensure the client's choice is both respected and acted on. CCS conducts safety inspections prior to move-in and monitors the needs of survivors with safety concerns.

3) CCS keeps all housing locations strictly confidential and does not advertise the locations on our website or in any database. Survivors are advised of laws protecting DV housing and service locations and cautioned to not disclose any locations to 3rd parties. Confidentiality agreements are signed by all staff, volunteers, survivors, and on-site visitors.

4) CCS staff and volunteers working directly with survivors complete Cal OES-certified 66.5- hour SA and DV Crisis Intervention Training, as well as 12 hours of ongoing training per year, qualifying every staff member as DV and SA counselors under State law. Staff receive extensive training in safety planning, lethality risk assessment, motivational engagement, offering voluntary, survivor-driven advocacy and support services responsive to the needs of the underserved groups in the CoC. CCS staff and volunteers who work directly with survivors complete cultural humility training founded on an anti-oppression model that explores privilege, power, and the experience of historically oppressed groups and respecting the diverse cultural, ethnic, linguistic, and beliefs of survivors.

5) CCS units prioritize safety using camera systems, and internal and external lighting and safety features. Security systems, locked gates/fenced properties, locked unit doors, and 24/7 staff. CCS has no published residences, safe-at-home programs are used. Staff provide education about internet and phone safety, use of 'go bags' or code words.

4A-3d.1.	Applicant's Experience in Evaluating Its Ability to Ensure DV Survivors' Safety.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below how the project evaluated its ability to ensure the safety of DV survivors the project served in the project, including any areas identified for improvement throughout the project's operation.

(limit 2,500 characters)

CCS conducts safety assessments with clients at intake, including administering the Self-Sufficiency Matrix (SSM) a 21-domain tool measuring the impact of CCS services on well-being and quality of life. Results range from 1-5 (1: In-crisis; 2: Vulnerable; 3: Safer; 4 Stable; 5 Thriving). Participants may complete the SSM on intake, at exit, and every six-months in GAINS. The SSM is conducted in interview format, so the questions align with assessing progress and immediate stressors. Feedback from tenants help identify areas of program weakness. All properties and units used for the program receive weekly inspections/safety checks to ensure that they are in good repair, have appropriate lighting, working locks, and other features that ensure the safety of survivors. In addition to intensive case management, residential supervisors are available after hours, and do several rounds to ensure safety and security. CCS can provide security cameras and other safety related devices to ensure survivors are protected.

Survivors are offered ongoing DV education class/support groups by CCS and if the client's location is compromised, CCS may update their safety plan, change their phone number, or relocate them from their unit utilizing an emergency transfer to a domestic violence shelter or other housing..

CCS uses a county-wide approach that considers safety planning and participant choice. For example, if the survivor has concerns about remaining in North County due to stalking, we may assist them with obtaining housing in South County. Each survivor will work with staff to develop a plan that identifies goals to allow them to work towards self-sufficiency while maintaining safety. CCS also offers security measures such as security cameras, safe at-home enrollment, Victims of Crime programs, transportation assistance, TRO assistance and has the ability to utilize flexible dollars to ensure additional safety precautions. CCS also has close relationships with law enforcement and has staff available 24/7. When or if any safety concerns arise, additional safety precautions are implemented, documented, and procedural updates implemented. Safe alternatives to public transit are an area for growth.

4A-3e.	Applicant's Experience in Placing and Stabilizing Survivors in Permanent Housing Using Trauma-Informed, Survivor-Centered Approaches.	
	NOFO Section I.B.3.j.(1)(d)	

	Describe in the field below the project applicant's experience in:
1.	prioritizing placement and stabilization of survivors;
2.	placing survivors in permanent housing;
3.	placing and stabilizing survivors consistent with their preferences; and
4.	placing and stabilizing survivors consistent with their stated needs.

(limit 2,500 characters)

1. CCS has 40 years of helping survivors. Over the past year alone, CCS responded to over 4,000 hotline and crisis intervention calls, diverted 18 households in 2 months, completed 700+assessments, managed long term for 223 persons, permanent housing for 80, provided nearly 2000 counseling and therapy sessions, legal services for 198, SAS advocacy (351). Connected with juvenile justice, schools, faith centers, courts, and health centers Community education and training (151) reaching over 3,000. Stabilization and dv recovery interventions (expressive arts, EMDR, motivational engagement) counseling, income support contribute to Survivor stabilization. CCCS staff hold professional certification in trauma-informed intervention. As Coordinator of the regional High Risk team, CCS connects to respoyrces, best practices, and information about effective techniques or overcoming barriers for survivors.

4A-3f.	Applicant's Experience in Trauma-Informed, Survivor-Centered Approaches.	
	NOFO Section I.B.3.j.(1)(d)	
	Describe in the field below examples of the project applicant's experience using trauma-informed, victim-centered approaches to meet needs of DV survivors by:	
	1. establishing and maintaining an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures survivors and staff interactions are based on equality, and minimize power differentials;	
	2. providing survivors access to information on trauma, e.g., training staff on providing survivors with information on the effects of trauma;	
	3. emphasizing survivors' strengths, e.g., strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans worked towards survivor-defined goals and aspirations;	
	4. centering on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed;	
	5. providing a variety of opportunities for survivors' connections, e.g., groups, mentorships, peer-to-peer, spiritual needs; and	
	6. offering support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.	

(limit 5,000 characters)

1) Due to the sensitive nature of survivors and their situations, assistance is always based on the survivor's choices and needs. Survivors choose immediate housing options and join in assessment to understand their needs. All programs follow a Trauma Informed/Housing First/Low Barrier model and prioritize rapid placement and stabilization in permanent housing without service participation requirements or preconditions. Housing stabilization is a priority all CCS services. Community partnerships are available to help survivors maintain their housing of choice. CCS operates programs for vulnerable populations and has created an infrastructure to streamline services and provide immediate assistance. When a survivor needs services, they contact CCS' 24/7 hotline or main office numbers, or business locations via phone, in person or email. Counselors screen clients, assist with initial paperwork, and help to coordinate care.

2) Training in appropriate engagement strategies and peer support helps ensure mutual respect and avoid power differentials. Staff and volunteers working directly with survivors complete a CCS' Cal OES-certified 66.5-hour SA and DV Crisis Intervention Training, and 12 hours of ongoing training per year, qualifying every staff member as DV and SA counselors under California law. Staff receive extensive training in safety planning, lethality risk assessment, Motivational Interviewing, and providing voluntary, survivor-driven advocacy and support services inclusive of, and responsive to, the needs of the underserved populations in SD County. All CCS staff and volunteers working directly with survivors' complete cultural humility training grounded in an anti-oppression model that explores privilege, power, and the experience of historically oppressed groups, respecting the cultural, ethnic, linguistic, and religious diversity of survivors.

3) CCS is a trauma-informed agency. All services are voluntary, trauma-informed, and client-centered. CCS provides education and emotional support using a strengths-based approach to problem-solving that honors survivor autonomy while exploring options to improve safety. Services are completely confidential and provided free of charge. CCS does not engage in activities that compromise survivor safety or autonomy. Staff are also trained to understand and educate survivors and landlords about the VAWA and the Fair Housing Act.

4) From the onset, victims will be experts on their own lives. At every stage of their participation, clients will identify their needs and next steps, and the pace at which they want to proceed. Clients will complete a self-sufficiency matrix assessment to identify current risks, needs, strengths, interests, and potential goals at intake. This tool will be used to identify strategies for staying safe, building stability, and thriving in their new housing. Staff will provide services through a trauma-informed, survivor-driven lens based on the client's identified priorities and unique needs. Clients will work with staff to regularly reassess needs, preferences, and requests for additional services. All supportive services will be voluntary. Staff will use motivational interviewing, reflective listening and encourage clients to identify their needs and readiness to pursue supportive services. All CCS staff and volunteers working directly with survivors complete cultural humility training grounded in an anti-oppression model that explores privilege, power, and the experience of historically oppressed groups. Cultural, ethnic, linguistic, and religious diversity, in addition to differences related to living in urban or remote rural settings, are significant factors in providing victim/survivor services. CCS housing and quality care has served underserved and vulnerable groups: helping higher-risk youth populations (homeless, foster, and LGBTQ+ youth) with dating violence prevention education, such as sexual assault services to college students. CCS has provided services to survivors who are deaf, have hearing loss, deaf/Blind, and persons with intellectual or

developmental disabilities.

5. CCS offers support groups through the counseling department both for adults and children. Peer-to-Peer advocates involve staff and volunteers in providing trauma-informed activities (support groups, children and adult gatherings) and relationship building to empower and make connections between lived experiences. Spiritual needs are acknowledged. CCS is proactive in ensuring beliefs are honored. CCS partners with the faith community and when locating permanent housing, spiritual needs are identified in those areas.

6. CCS' services offer trauma-informed parenting and related skills training by a Child Advocate or Clinical Therapist. Legal services assist survivors in obtaining TRO's, family law matters and court accompaniment. Expanded options for childcare and parent support occur via community service connections

4A-3g.	Applicant's Experience Meeting Service Needs of DV Survivors.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below examples of supportive services the project provided to domestic violence survivors while quickly moving them into permanent housing and addressing their safety needs.

(limit 5,000 characters)

CCS provides many supportive services for survivors. All services are offered in English and Spanish, with additional languages, including sign languages, provided by certified interpreter services:

*Trauma-Specific Counseling: CCS operates counseling programs in 3 regions. A team of staff therapists provide individual, group, family, and child counseling using a variety of best practice, trauma-specific approaches, such as trauma-focused cognitive behavioral therapy; Trauma Resiliency Model; Eye Movement Desensitization and Reprocessing (EMDR); guided imagery, expressive arts, play and, sand tray, and mindfulness therapies. Our counseling program includes master's- level Marriage and Family Therapy, Social Work, or Professional Clinical Counselor Trainees who receive intensive training, supervision, and commit twenty hours per week to CCS. Youth counseling services are offered by two more child therapists and a child advocate. The child advocate ensures that all youth seeking support to heal from trauma have wrap-around, holistic resources, and referrals suited to their unique needs. Individual and group counseling for adults and children is offered on-site at our business offices and short-term emergency shelters.

* Healing therapies and education (children): Survivor and their children need gentle, caring therapies to help the healing process. Art and play therapy, expressive movement, child-specific advocacy and education. CCS Education services outreach to juvenile detention, schools, health clinics and faith centers to build awareness and intervene in the DV cycle for victims, children, and youth.

* Legal Services: Free confidential legal services are provided in three regions. Full-time victim advocates provide crisis counseling, safety planning, intimate partner violence lethality assessments, court accompaniment, application assistance, information, referrals, and emotional support to victims of intimate partner violence. Advocates utilize their significant community connections to help survivors access safe housing, legal services, counseling, immigration services, food, clothing, and other support services. CCS Staff a team of licensed attorneys providing specialty care at a courthouse and three regional sites.

* Intimate Partner Violence intervention. Shelters: CCS operates both short-term and long- term confidential intimate partner violence shelters. Project Safe House (PSH) is a short-term, 24-bed intimate partner violence shelter located in East San Diego County, and Hidden Valley House (HVVH) is a short-term, 40-bed intimate partner violence shelter located in North Inland Region of San Diego County. Both shelters are staffed 24-hours per day by certified intimate partner violence counselors. Intimate partner violence victims and their children are sheltered in these programs for up to two months, receiving advocacy, counseling, safety planning, client services, legal assistance, food, clothing, transportation assistance, and other services and resources to help them stabilize and transition to more permanent housing. All CCS intimate partner violence shelter programs accept adults and children of all genders.

* DV Housing First: The DV Housing First program addresses long-term safe and stable housing as a key component to long-term survivor self-sufficiency. The program improves the way communities respond to intimate partner and sexual violence by integrating housing stability into advocacy, assisting survivors with accessing and/or retaining housing. CCS' Housing Coordinator provides mobile advocacy, community outreach, and financial assistance for rent and other supportive services.

*Intimate Partner Violence, Sexual Assault, and Stalking Hotline Counseling: CCS provides toll-free, confidential, 24-hour hotline crisis counseling, safety planning, information, and referrals to a host of follow-up services, including

counseling, advocacy, legal assistance, medical care, shelter, food, and clothing, staffed by certified Domestic Violence and Sexual Assault Victim Counselors.

* Sexual Assault Services (SAS) - SAS is one of the largest state-funded rape crisis centers in the State and covers most of San Diego CoC. Services include crisis counseling, safety planning, trauma-informed client services, and help with connecting to other resources, including counseling, legal services, housing, medical care, food, clothing, and immigration assistance.

* Sexual Assault Response Team provides emergency response to any victim in its service area who undergoes a sexual assault forensic exam. CCS volunteers and staff offer 24 hour response within 45 minutes and support victims during the full process providing crisis support, advocacy, education, and resources. Full-time victim advocates in three regions provide follow-up services after the emergency ends.

Advocacy: provides in-person emotional support during detective and attorney interviews, hearings, and other court events.

4A-3h.	Applicant's Plan for Placing and Stabilizing Survivors in Permanent Housing Using Trauma-Informed, Survivor-Centered Approaches in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(e)	
	Describe in the field below how the project(s) will:	
1.	prioritize placement and stabilization of program participants;	
2.	place program participants in permanent housing;	
3.	place and stabilize program participants consistent with their preferences; and	
4.	place and stabilize program participants consistent with their stated needs.	

(limit 2,500 characters)

1.Survivors will access the CCS portfolio of emergency response, assessment, housing, and support services and to the resources of the community network during their journey to stability. Whether contact is from 24-hour hotline, a CES referral, or law enforcement, survivor safety and choice are primary. Starting with information offered by referral sources, CCS staff and victims act to assess immediate safety needs and seek legal protections when needed. Together they explore the needs and desires of the victim and establish a client-driven plan.

2.Using its two shelter programs (64 beds) to ensure rapid access to a safe space for up to 90 days when other options are not available. Immediate offers for long term housing 18-24 months in CCS 5 townhomes, apartment, and scattered site RRH, and DV Housing First) are chosen by the survivor. The Enhanced Pathway project new TH and RRH capacity will add to their choices. CCS role in the DV network helps connect victims to other resources and PHA priority units (mainstream HCV, SRA, PBRA units) and PHA preferences for households referred through the RTFH. When safety is compromised, emergency transfer agreements between VSP agencies and CES policies expedite moves to safety. CCS staff also explore diversion to non-system resources, even those outside the CoC, such as moves to join extended family. With each move, determining housing locations and features that feel safe is key.

3.All decisions rest in the hands of the survivor yet Staff know that being empowered to choose can be unfamiliar and stressful. Patient and support are essential. An array of supports and healing therapies for adults, youth, and children aid in gaining stability. Together CCS staff and the survivor look at options and survivor's choice is honored.

4.A comprehensive needs assessment and the victim's self-sufficiency matrix assessment identify current risks, needs, strengths, interests, and potential goals. The tool will be used to identify strategies for staying safe, building stability, and thriving in their new housing. Staff will provide services through a trauma- informed, survivor-driven lens based on the client's identified priorities and unique needs. Clients will work with staff to regularly reassess needs, preferences, and requests and seek resources to meet those needs.

4A-3i.	Applicant's Plan for Administering Trauma-Informed, Survivor-Centered Practices in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(e)	

Describe in the field below examples of how the new project(s) will:

1.	establish and maintain an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures program participant and staff interactions are based on equality, and minimize power differentials;
2.	provide program participants access to information on trauma, e.g., training staff on providing program participants with information on the effects of trauma;
3.	emphasize program participants' strengths—for example, strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans work towards survivor-defined goals and aspirations;
4.	center on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed;
5.	provide a variety of opportunities for program participants' connections, e.g., groups, mentorships, peer-to-peer, spiritual needs; and
6.	offer support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.

(limit 5,000 characters)

1. Surviving the DV experience and acting to flee requires courage and strength. CCS staff honor the survivor and work to create an environment of mutual trust, comfort and equality. Cultural awareness, empowerment, understanding trauma are key skills for all staff. Services are offered and housing support is not contingent on participating in services. Keen awareness of power and control issues for survivors fosters client empowerment and staff caution in interacting with the survivor. Staff will provide services through a trauma-informed, survivor-driven lens based on the participant's identified priorities and unique needs. Survivors working with staff assess needs, preferences, and requests for support. Using a DV Housing First model, participation services will be voluntary. Staff use motivational engagement and reflective listening techniques to encourage survivors to express their needs and desires. Placement and stabilization in permanent housing, based on the clients wishes, expressed needs, and sense of safety are central in CCS culture. As a Joint project (TH/RRH) survivors get to select the housing option that feel best to them. Survivors can choose direct access to TH or CCS housing or receive support to conduct a housing search. Housing placement and stabilization is multifaceted. Participants will complete a self-sufficiency matrix assessment to identify current risks, needs, strengths, interests and potential goals at intake. This tool will be used to identify strategies for staying safe, building stability and thriving in their new housing. The Family Advocates and Housing Coordinator will help participants identify safe housing in communities of their choosing and will connect them with community supports that are meaningful for them, including, faith communities, cultural/community centers, schools, self-help groups.

2. Cultural competence and trauma-informed care means that staff understand and recognize the impact of trauma on behavior and emotion. CCS staff re certified in trauma- informed practices support survivor healing after extensive training. CCS responds to the special needs of children exposed to trauma and the negative impact of adverse childhood experiences that remain in adulthood. Emphasizing client strengths in every interaction (counseling, case management, groups, planning) slowly builds capacity. Cultural competence and cultural humility approaches by staff and actions geared to inclusiveness (Equal Access, victim involvement) in daily interactions build an empowering environment. Training on cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed are part of the CoC Furthering Equity Policy processes. Bilingual/bicultural counseling resonates with inclusion.

3. CCS reinforces the CoC policies and training about Anti-discrimination, Fair Housing, Equal Access, Cultural Relevance, Housing First, Motivational Interviewing, Educational Assurances, as well as VSP tips for Survivors (such as go bags, code words, TRO enforcement, travel school and safety.) CCS commits specific actions to furthering equity that have measurable outcomes, and reviews and reports on implementation annually.

4. Support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services connection to child care resources, support groups for children, and extensive training connections with local schools enhances the environment for parents and youth. Training for survivors and advocacy will be mobile and provided in locations safe and convenient for the participant (CCS' offices, lunch break at work, hotel meeting rooms, community venues, participant's home). Encrypted video sessions will also be an option if desired. Legal Advocates and therapists will support survivors' needs on an ongoing basis to assist in the healing journey.

4A-3j.	Applicant's Plan for Involving Survivors in Policy and Program Development, Operations, and Evaluation in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(f)	
	Describe in the field below how the new project will involve survivors:	
1.	with a range of lived expertise; and	
2.	in policy and program development throughout the project's operation.	

(limit 2,500 characters)

1. CCS staff, volunteers, board members and survivors drive and believe in the mission of CCS. Many CCS staff and Board members are survivors of DV/SA which is what draws them to be involved in the agency. Input by each group is integrated into the program designs and suggestions/feedback is considered. Advisory groups, board members, suggestion boxes, collaborative efforts which include survivors, knowledge, and lessons learned come back from the community. Many have either experienced SA. One in four women have this experience. Their voices help shape the services to be offered, like SAS, that are not typical in housing programs. CCS invites consumers to participate in events, peer support or expressive acts activities. Client involvement rests on CCS' awareness of the risks of secondary or vicarious trauma, and shapes engagement in ways that protect them. CCS connects with an array of survivors through their services in the community, like juvenile detention and through advocacy and education in schools.

2. CCS gathers information from survivors to help inform the program design and survivors changing needs over time. Their feedback and ideas form actions in the develop this new project. Survivor's voices will lead the process of program formation. Utilizing CCS' empowerment model, survivor clients ultimately lead and inform the healing process and will staff partner with them to assist in success. Client Satisfaction surveys are provided for feedback from survivors to assist in implementing suggestions and ideas in collaboration with CCS staff, specifically for existing projects and new projects. Client feedback and honest, open communications help inform program and organizational policies and operations. Exit meetings and follow up services open up opportunities for ongoing feedback throughout the program operations.

Project Applicants Applying for New PH-RRH and Joint TH and PH-RRH DV Bonus Projects

4A-3b.	Information About Unique Project Applicant Requesting New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)	
	Enter information in the chart below on the project applicant that applied for one or more New DV Bonus housing projects included on your CoC's FY 2024 Priority Listing for New Projects:	

1.	Applicant Name	Community Resource Center
2.	Rate of Housing Placement of DV Survivors–Percentage	97%
3.	Rate of Housing Retention of DV Survivors–Percentage	70%

4A-3b.1.	Applicant's Housing Placement and Retention Data Explanation.	
	NOFO Section I.B.3.j.(1)(d)	

	For the rate of housing placement and rate of housing retention of DV survivors reported in question 4B-3b., describe in the field below:
1.	how the project applicant calculated the rate of housing placement;
2.	whether the rate for housing placement accounts for exits to safe housing destinations;
3.	how the project applicant calculated the rate of housing retention; and
4.	the data source (e.g., comparable databases, other administrative data, external data source, HMIS for non-DV projects).

(limit 1,500 characters)

Housing Placement

CRC's housing placement rate was calculated using the formula:

Placement Rate = (Total Households Served/Households Placed into Permanent Housing) × 100

In 2023, 38 out of 39 DV RRH client households of were successfully placed into permanent housing. Using the formula: CRC's 2023 Placement Rate = $(38/39) \times 100 = 97\%$

This rate accounts only for households placed into safe housing, with each placement confirmed by a case manager to be in an abusive free environment. Clarity Question 8a data report was used as the source for tracking and verifying these placements.

Housing Retention

CRC's housing retention rate was calculated using the following formula:

Retention Rate = Households Reached at Follow-Up /Households Stably Housed at Follow-Up × 100

CRC was able to reach 10 of Based 21 households and that exited DV RRH and/or Transitional Housing in 2023 at the 6 month follow up. Seven of those 10 individuals confirmed that they were still stably and safely (with no domestic violence reported) housed 6 months after exiting the program. Therefore, CRC's retention rate was 70% based on completed follow ups for calendar year 2023 using the formula: CRC's 2023 Retention Rate= $(7/10) \times 100 = 70\%$

The data source is CRC's Efforts to Outcomes (ETO) database used to verify housing status at 6 and 12 months after program exit. The follow results are based on the feedback from participants who exited the DV RRH and Transitional Housing programs.

4A-3c.	Applicant's Experience Housing DV Survivors.	
	NOFO Section I.B.3.j.(1)(d)	

	Describe in the field below how the project applicant:
1.	ensured DV survivors experiencing homelessness were quickly moved into safe affordable housing;

2.	prioritized survivors—you must address the process the project applicant used, e.g., Coordinated Entry, prioritization list, CoC's emergency transfer plan;
3.	determined survivors' supportive services needs;
4.	connected survivors to supportive services; and
5.	moved survivors from assisted housing to housing they could sustain—address housing stability after the housing subsidy ends.

(limit 2,500 characters)

1. CRC ensures that domestic violence (DV) survivors move quickly to safe affordable housing with a unique spectrum of services to help them achieve safety, stability and self-sufficiency. DV services include Carol's House Emergency Shelter, transitional housing (TH) and rapid rehousing (RRH), DV hotline, Therapeutic Children's Center, counseling, legal advocacy, and, education and prevention, which includes job and career development. Clients are referred by law enforcement, health providers, social services agencies, or come to CRC directly or via CRC's 24-Hour DV hotline. CRC provides crisis support through counseling and case management. Counseling and case management facilitate trauma recovery and reduce the time needed to prepare for permanent housing.
2. Survivors are prioritized based on their emergent needs. Shelters assess the level of danger and urgency and make direct placements into available housing programs. Trained staff make direct referrals through CRC's emergency shelter and the greater San Diego County DV shelter system.
3. Licensed mental health clinicians and case managers determine client supportive service needs. Clinicians assess client emotional and mental health, create personalized treatment plans and help them learn to cope with the severe emotional and mental trauma of abuse. Participants may choose individual and/or peer group counseling. CRC also offers family therapy. Survivors also meet with a DV case manager/advocate to discuss their situation, develop a safety plan, and if needed, receive access to emergency shelter. Survivors are also connected to CRC's other case management services, including food and nutrition programs, employment and benefits assistance.
4. CRC offers most supportive services in-house, as described above. For medical, healthcare, attorney, immigration, or other supportive services that CRC does not provide, we offer referrals to other providers.
5. Case Managers work with clients to ensure they secure and move to safe housing. After moving, clients can continue to access CRC's Food and Nutrition Center and other supportive services as needed. Many survivors receive transitional housing through CRC's program for 12-24 months, enabling them to attend school and work, and save money for permanent housing. CRC helps participants to identify an affordable home and offers rental assistance to facilitate acquisition. CRC may provide gift cards to CRC's resale stores for household items and furniture.

4A-3d.	Applicant's Experience in Ensuring DV Survivors' Safety.	
	NOFO Section I.B.3.j.(1)(d)	
	Describe in the field below examples of how the project applicant ensured the safety and confidentiality of DV survivors experiencing homelessness by:	
1.	taking steps to ensure privacy/confidentiality during the intake and interview process to minimize potential coercion of survivors;	
2.	making determinations and placements into safe housing;	
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3.	keeping survivors' information and locations confidential;
4.	training staff on safety and confidentiality policies and practices; and
5.	taking security measures for units (congregate or scattered site), that support survivors' physical safety and location confidentiality.

(limit 2,500 characters)

1. Ensuring Privacy and Confidentiality During Intake

CRC ensures survivors' privacy by conducting assessments in secure, private spaces, either in-person or virtually. Only authorized staff are involved, and survivors are informed of their confidentiality rights. We use trauma-informed approaches to create a supportive, empowerment-based environment, allowing survivors to share information at their own pace, without any pressure to disclose details that may compromise their safety. All client files are kept confidential in locked filing cabinets within secure, restricted offices.

2. Placement in Safe Housing

Housing placements are based on each survivor's safety needs and preferences. CRC works closely with survivors to identify the safest option, whether emergency shelter, transitional housing, or rapid re-housing. Both scattered-site and congregate housing are considered depending on the survivor's risk level and location preferences, ensuring they are placed in a safe environment, away from potential threats, including proximity to known abusers.

3. Keeping Information Confidential

Maintaining confidentiality is a top priority. CRC does not enter personally identifiable information into general systems like HMIS, adhering to VAWA and HUD guidelines. Instead, we use the DV-specific HMIS site, which offers enhanced protection. Electronic data is encrypted and accessible only to authorized personnel, while physical records are securely stored. Housing locations remain confidential, and staff use anonymized communication methods to protect survivors' identities and locations.

4. Staff Training

CRC staff receive training in trauma-informed care, safety planning, and confidentiality policies. The training emphasizes empowerment-based communication, safeguarding survivor privacy, and recognizing signs of coercion. Staff receive regular updates on best practices, ensuring they can effectively respond to the unique safety and confidentiality needs of survivors.

5. Security Measures

Security is a priority in shelter, transitional housing, and scattered-site housing. Congregate sites have controlled access systems, such as key cards, and scattered-site locations are selected based on safety criteria, with additional security features like reinforced doors or surveillance cameras as needed. Survivors are provided with safety planning resources, and CRC coordinates with law enforcement when necessary to address any ongoing security concerns.

4A-3d.1.	Applicant's Experience in Evaluating Its Ability to Ensure DV Survivors' Safety.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below how the project evaluated its ability to ensure the safety of DV survivors the project served in the project, including any areas identified for improvement throughout the project's operation.

(limit 2,500 characters)

Evaluating the Safety of DV Survivors. CRC's DV Bonus Joint TH/RRH project is new and will evaluate its ability to ensure safety based on its ongoing TH and RRH programs which regularly evaluate each program's ability to ensure the safety of survivors through multiple strategies. The primary methods of evaluation include regular feedback from survivors, safety plan reviews, and internal assessments of program practices.

Survivor Feedback and Input: We collect survivor feedback through confidential surveys, feedback forms and client interviews to assess how safe survivors feel in the program and identify any areas of concern. Survivors are encouraged to provide input on the physical safety of housing units, their interactions with staff, and any potential threats to their safety during their stay in transitional housing or after moving to permanent housing. This feedback is instrumental in shaping program improvements.

Safety Planning and Monitoring: Each survivor in the program develops an individualized safety plan with the help of their case manager. This plan is reviewed and updated regularly to reflect any changes in the survivor's situation or risk factors. Safety planning includes not only physical safety, but also emotional and mental well-being. The case managers continually assess the survivor's immediate environment for potential risks, ensuring they are placed in safe housing that is far from known abusers or dangerous situations. These evaluations help CRC ensure ongoing safety and quickly address emerging threats.

Staff Training and Internal Reviews: Staff members are trained to recognize safety risks and address them proactively. Through trauma-informed care and empowerment-based communication, staff help survivors make informed decisions that enhance their safety. Additionally, CRC holds monthly safety committee meetings to review safety protocols and confidentiality measures. These reviews help identify any areas that require strengthening or adjustment.

Areas for Improvement: Through ongoing evaluation, CRC has identified opportunities to improve its safety protocols. CRC is working to enhance staff training on emerging best practices in DV care, particularly in addressing mental health challenges that affect long-term safety. By continuously evaluating safety through survivor feedback, case management practices, and internal reviews, CRC remains committed to improving the safety and well-being of all DV survivors in all programs.

4A-3e.	Applicant's Experience in Placing and Stabilizing Survivors in Permanent Housing Using Trauma-Informed, Survivor-Centered Approaches.	
	NOFO Section I.B.3.J.(1)(d)	
	Describe in the field below the project applicant's experience in:	
1.	prioritizing placement and stabilization of survivors;	
2.	placing survivors in permanent housing;	
3.	placing and stabilizing survivors consistent with their preferences; and	
4.	placing and stabilizing survivors consistent with their stated needs.	

(limit 2,500 characters)

CRC has extensive experience placing and stabilizing domestic violence survivors in permanent housing using trauma-informed and survivor-centered practices. Our approach prioritizes survivors' individual preferences and needs, ensuring both safety and long-term stability.

1. Prioritizing Placement and Stabilization of Survivors:

CRC quickly assesses survivors' immediate safety and housing needs upon intake, prioritizing those at the highest risk or facing housing instability. Our trauma-informed case management ensures prompt housing placements and minimizing further trauma and victimization. CRC provides comprehensive support after placement, including mental health counseling, safety planning, and ongoing case management to help stabilize and empower them as they rebuild their lives.

2.Placing Survivors in Permanent Housing:

CRC has a proven record of placing survivors in permanent housing through its RRH program. Using a Housing First model, CRC eliminates barriers such as income requirements or past rental history. Our Housing Coordinator works closely with landlords to secure housing and maintain relationships to ensure successful placements. Case managers assist survivors in navigating the housing search, securing leases, and maintaining communication with landlords to address any issues during tenancy. CRC's housing programs aim to move survivors swiftly from transitional housing to permanent housing.

3. Placing and Stabilizing Survivors Consistent with Their Preferences:

CRC respects each survivor's autonomy by offering housing options that align with their personal preferences. Case managers work with survivors to understand their safety concerns and preferred locations. Survivors can choose between scattered-site or transitional housing, with priority given to proximity to schools and supportive services. This flexible approach empowers survivors in their housing journey, ensuring their preferences are honored.

4.Placing and Stabilizing Survivors Consistent with Their Stated Needs:

Survivors' needs are assessed during intake and case management. Case managers address physical, emotional, and financial needs, creating individualized service plans that guide housing placements. Counseling, legal advocacy, financial assistance, and childcare are provided. After placement in permanent housing, CRC offers voluntary support services to ensure long-term stabilization, helping survivors maintain housing and build sustainable futures.

4A-3f.	Applicant's Experience in Trauma-Informed, Survivor-Centered Approaches.	
	NOFO Section I.B.3.j.(1)(d)	
	Describe in the field below examples of the project applicant's experience using trauma-informed, victim-centered approaches to meet needs of DV survivors by:	
	1. establishing and maintaining an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures survivors and staff interactions are based on equality, and minimize power differentials;	
	2. providing survivors access to information on trauma, e.g., training staff on providing survivors with information on the effects of trauma;	
	3. emphasizing survivors' strengths, e.g., strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans worked towards survivor-defined goals and aspirations;	
	4. centering on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed;	
	5. providing a variety of opportunities for survivors' connections, e.g., groups, mentorships, peer-to-peer, spiritual needs; and	
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6.	offering support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.
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(limit 5,000 characters)

CRC's Experience in Trauma-Informed, Survivor-Centered Approaches
CRC has a strong commitment to using trauma-informed, survivor-centered approaches to meet the diverse needs of domestic violence survivors. Our experience in this area is demonstrated through practices designed to empower survivors, promote agency, and foster mutual respect.

1. Establishing an Environment of Agency and Mutual Respect:

CRC creates a supportive environment that prioritizes agency and mutual respect. We avoid punitive interventions, fostering an atmosphere where survivors feel safe and valued. Staff interactions are based on equality, and we actively work to minimize power differentials in our relationships with clients. Through ongoing training, we ensure that all staff understand the importance of creating a respectful space where survivors can express themselves freely and make informed choices regarding their lives and services.

2. Providing Access to Information on Trauma:

Our team is trained to provide survivors with essential information about the effects of trauma, including understanding how trauma impacts behavior, mental health, and decision-making. We equip our staff to share this knowledge with survivors, helping them recognize their responses to trauma and the importance of self-care. By offering workshops and resources on trauma, we empower survivors to better understand their experiences and navigate their healing journey.

3. Emphasizing Survivors' Strengths:

CRC emphasizes a strength-based approach in all interactions with survivors. We utilize strength-based case management, questionnaires, and assessment tools that focus on identifying and building upon survivors' strengths. Case plans are collaboratively developed, reflecting survivor-defined goals and aspirations, ensuring that services align with their personal visions for recovery and empowerment. This approach promotes resilience and fosters a sense of agency among survivors.

4. Centering on Cultural Responsiveness and Inclusivity:

Cultural responsiveness is central to CRC's mission. We provide ongoing training on equal access, cultural competence, nondiscrimination, and language access to all staff. This training aims to improve services and ensure they are culturally responsive, accessible, and trauma informed. We actively seek feedback from survivors about their cultural needs and preferences, continuously refining our services to reflect and honor the diverse backgrounds of those we serve.

5. Providing Opportunities for Connections:

CRC offers various opportunities for survivors to connect with one another and their communities. We facilitate support groups that foster a sense of belonging and shared experience. Additionally, we consider survivors' spiritual needs by providing resources and connections to spiritual support when requested. These opportunities enhance the healing process and help survivors build supportive networks.

6. Offering Support for Survivor Parenting:

Understanding that parenting can be particularly challenging for survivors, CRC provides access to childcare services through its Therapeutic Children's Center. Our center recognizes the unique challenges faced by survivors and offers strategies to promote healthy parenting practices. We also connect survivors to legal services that address child custody and protection issues, ensuring they have the support needed to navigate these complexities.

In summary, CRC's experience in trauma-informed, survivor-centered approaches reflects our commitment to creating an empowering environment that recognizes and respects the unique needs and strengths of each survivor.

Through our practices, we foster healing, resilience, and long-term stability for those we serve..

4A-3g.	Applicant's Experience Meeting Service Needs of DV Survivors.	
	NOFO Section I.B.3.j.(1)(d)	

Describe in the field below examples of supportive services the project provided to domestic violence survivors while quickly moving them into permanent housing and addressing their safety needs.

(limit 5,000 characters)

CRC's deep commitment to providing comprehensive supportive services to DV survivors while swiftly facilitating their transition into permanent housing is shown by the examples below. Through trauma-informed case management, safety planning, counseling, and housing support, CRC ensures that survivors' safety, emotional health, and housing needs are met in a holistic, survivor-centered manner.

Comprehensive Safety Planning

Personalized safety planning is a core service designed to address the immediate and long-term safety needs of each survivor. Upon intake, survivors undergo a thorough safety assessment to identify potential threats from abusers and other risks. Case managers work closely with them to develop individualized safety plans, which include strategies for staying safe while living in emergency shelters or transitional housing and during their transition to permanent housing. This personalized approach ensures that each survivor's specific safety concerns are addressed, helping them feel more secure as they rebuild their lives. It also empowers survivors to take an active role in their own safety.

Trauma-Informed Case Management

Trauma-informed case management provides survivors with emotional and practical support throughout their journey from shelter to permanent housing. Case managers are trained to approach each survivor with empathy and understanding, recognizing the impact of trauma on their lives and decision-making. Individualized service plans address their housing needs, mental health support, financial assistance, and connection to community resources. This approach is survivor-driven, allowing survivors to dictate the pace and extent of their participation in services. This ensures that survivors feel respected and understood, enhancing their ability to recover from trauma and transition into stable housing successfully and allowing flexibility in addressing a wide variety of needs beyond just housing.

Housing Placement with Rapid Re-Housing (RRH) and Transitional Housing (TH): CRC has successfully placed many survivors in safe, permanent housing through its RRH and TH programs. The RRH program follows Housing First principles - minimal barriers to entry. RRH ensures that survivors quickly gain access to stable housing without the need to fulfill any preconditions such as income or sobriety requirements, which can be a significant barrier in other programs. Survivors are placed in permanent housing as quickly as possible, receive rental assistance and case management to help them stabilize. Survivors in TH receive the same supportive services until they are ready to move into permanent housing. The combination of RRH and TH offers flexibility, allowing survivors to remain in a safe environment until they find permanent housing.

Mental Health and Counseling Services: CRC offers mental health counseling and therapy, individual and group counseling sessions led by trained therapists specializing in trauma recovery, to help survivors address the trauma of domestic violence. CRC's mental health clinicians assess each survivor's mental health and create tailored treatment plans to help them cope with the psychological impacts of abuse. CRC also provides specialized services for children of survivors, such as play therapy and age-appropriate counseling, to help them process their own trauma. Counseling services provide critical support for survivors and their children, helping them recover emotionally, develop healthy coping mechanisms and reduce the likelihood of re-traumatization during their housing transition.

Support for Survivors' Economic Stability: CRC addresses economic stability of survivors, recognizing that financial independence is essential for maintaining

permanent housing. Case managers help survivors access job training, employment opportunities, and educational resources. Survivors can also receive financial assistance for essentials such as transportation, food, and childcare, reducing barriers to gaining employment or furthering their education. Economic support increases survivors' chances of achieving long-term stability by helping them build the skills and resources necessary to remain independent from their abusers. Improving economic stability empowers survivors to regain control over their lives.

Collaboration with Community Partners : CRC works closely with local healthcare providers, human service organizations and educational institutions to provide comprehensive services. Collaboration ensures that survivors have access to a broad range of supportive services beyond what CRC can offer directly. Partnering with other organizations allows CRC to provide more robust support and address the diverse needs of survivors. These partnerships also create a larger safety net, increasing survivors chances of long-term success

4A-3h.	Applicant's Plan for Placing and Stabilizing Survivors in Permanent Housing Using Trauma-Informed, Survivor-Centered Approaches in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(e)	
	Describe in the field below how the project(s) will:	
	1. prioritize placement and stabilization of program participants;	
	2. place program participants in permanent housing;	
	3. place and stabilize program participants consistent with their preferences; and	
	4. place and stabilize program participants consistent with their stated needs.	

(limit 2,500 characters)

CRC's Plan for Placing and Stabilizing Survivors: CRC will employ trauma-informed, survivor-centered approaches that prioritize the placement and stabilization of domestic violence (DV) survivors in permanent housing in our new Joint Rapid Re-Housing (RRH) and Transitional Housing (TH) program.

1. Prioritizing Placement and Stabilization of Program Participants: CRC will prioritize participants by conducting comprehensive intake assessments to identify immediate safety and housing needs. Survivors facing imminent danger or those without stable housing will receive priority. Case managers will work closely with participants to create personalized safety plans and housing strategies, ensuring they feel secure and supported throughout the placement process.

2. Placing Program Participants in Permanent Housing: Through the RRH component of our program, CRC will use a Housing First model, eliminating barriers such as income verification and prior rental history. We will work collaboratively with landlords and community housing providers to secure safe, permanent housing quickly. Dedicated housing coordinators will manage landlord relationships, ensuring smooth transitions for participants. Survivors will be assisted with lease agreements and will have ongoing support to address any concerns that arise during their tenancy.

Placing and Stabilizing Program Participants Consistent with Their Preferences

3. Respecting survivors' autonomy, CRC will actively involve them in housing selection. Case managers will provide options that align with participants' preferences for location, housing type, and access to community resources. Whether scattered-site or transitional housing, survivors will have the final say, ensuring that their choices reflect their unique needs and comfort levels.

4. Placing and Stabilizing Program Participants Consistent with Their Stated Needs

Participants will receive individualized service plans tailored to their physical, emotional, and financial needs. Our trauma-informed approach ensures that case managers assess and address these needs throughout the housing process. Mental health support, financial assistance, and access to childcare will be available at the survivor's option to enhance stability and promote self-sufficiency. By continually engaging with participants, CRC adapts support as needed to ensure they maintain their permanent housing and build a sustainable future.

4A-3i.	Applicant's Plan for Administering Trauma-Informed, Survivor-Centered Practices in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(e)	
	Describe in the field below examples of how the new project(s) will:	
1.	establish and maintain an environment of agency and mutual respect, e.g., the project does not use punitive interventions, ensures program participant and staff interactions are based on equality, and minimize power differentials;	
2.	provide program participants access to information on trauma, e.g., training staff on providing program participants with information on the effects of trauma;	
3.	emphasize program participants' strengths—for example, strength-based coaching, questionnaires and assessment tools include strength-based measures, case plans work towards survivor-defined goals and aspirations;	
4.	center on cultural responsiveness and inclusivity, e.g., training on equal access, cultural competence, nondiscrimination, language access, improving services to be culturally responsive, accessible, and trauma-informed;	
5.	provide a variety of opportunities for program participants' connections, e.g., groups, mentorships, peer-to-peer, spiritual needs; and	
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6.	offer support for survivor parenting, e.g., trauma-informed parenting classes, childcare, connections to legal services.
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(limit 5,000 characters)

CRC's Plan for Administering Trauma-Informed, Survivor-Centered Practices in TH-RRH: CRC's new DV Bonus Joint Rapid Re-Housing (RRH) and Transitional Housing (TH) program will implement trauma-informed, survivor-centered practices to ensure a supportive environment that empowers domestic violence survivors. Our approach will encompass the following key elements:

1. Establishing and Maintaining an Environment of Mutual Respect CRC is committed to fostering a culture of mutual respect and agency. We will prioritize non-punitive interventions, ensuring that our interactions with program participants are grounded in equality. Our staff will be trained to recognize and minimize power differentials, encouraging open communication and collaboration. Participants will be involved in decision-making processes regarding their housing and support services, reinforcing their sense of autonomy and control over their lives.

2. Providing Program Participants Access to Information on Trauma Training for all staff will emphasize the effects of trauma on individuals. We will ensure that program participants are informed about trauma's impact on their well-being and recovery. Educational resources will be made available through workshops, informational sessions, and individual discussions. This knowledge will empower participants to better understand their experiences and seek appropriate support.

3. Emphasizing Program Participants' Strengths: Our program will adopt a strengths-based approach, focusing on the inherent strengths and resilience of survivors. Assessments and case plans will include strength-based measures, highlighting participants' goals and aspirations. Case managers will work collaboratively with survivors to develop personalized plans that leverage their strengths, promote self-efficacy, and foster personal growth. This emphasis on strengths will help participants regain confidence and stability in their lives.

4. Centering on Cultural Responsiveness and Inclusivity: CRC recognizes the importance of cultural responsiveness and inclusivity in service delivery. We will provide ongoing training for staff on equal access, cultural competence, and nondiscrimination. Efforts will be made to improve language access and ensure that services are accessible and relevant to diverse populations. Our aim is to create an inclusive environment where all survivors feel understood and respected, regardless of their background.

5. Providing Opportunities for Participant Connections: We will facilitate a variety of opportunities for connection among program participants. This will include support groups to foster a sense of community and belonging. Spiritual needs will also be addressed through optional spiritual support and resources. By creating a supportive network, survivors can share experiences, learn from one another, and build lasting relationships.

Offering Support for Survivor Parenting

Understanding the unique challenges faced by parenting survivors, CRC will provide trauma-informed access to childcare services through CRC's Therapeutic Children's Center. Participants will receive guidance on parenting strategies that promote healing and resilience. Connections to legal services will also be facilitated, ensuring that parenting survivors receive comprehensive support in navigating their circumstances.

In summary, CRC's new DV Bonus Joint RRH and TH program will prioritize trauma-informed, survivor-centered practices that empower participants, promote safety and well-being, and foster community connections. Through these initiatives, we aim to create a supportive environment where domestic violence survivors can heal, thrive, and rebuild their lives.

4A-3j.	Applicant's Plan for Involving Survivors in Policy and Program Development, Operations, and Evaluation in the New DV Bonus Housing Project(s).	
	NOFO Section I.B.3.j.(1)(f)	
	Describe in the field below how the new project will involve survivors:	
1.	with a range of lived expertise; and	
2.	in policy and program development throughout the project's operation.	

(limit 2,500 characters)

CRC's Plan for Involving Survivors in Policy and Program Development, Operations, and Evaluation in the New DV Bonus Housing Project(s)
CRC recognizes that the voices of survivors are essential to the success of the new DV Bonus Joint RRH and TH program. To ensure that the program reflects the needs and preferences of those it serves, we will implement the following strategies to actively involve survivors with a range of lived expertise:

1. Ongoing Feedback Mechanisms: Throughout the project's operation, we will implement continuous feedback mechanisms, such as surveys and one-on-one interviews, to gather survivor experiences and suggestions. This feedback will be used to make real-time adjustments to services, ensuring they remain responsive to participant's needs. Regularly scheduled feedback sessions will allow survivors to express their thoughts on the program's strengths and areas for improvement.
2. Collaborative Policy Development: Survivors will be directly involved in the development of program policies. We will gather feedback from comment boxes and directly solicit feedback from current and former participants. This collaborative approach will empower survivors to influence decisions that impact their lives and promote a sense of ownership in the program.

By embedding survivor involvement throughout the policy and program development process, CRC aims to create a responsive and inclusive DV Bonus Joint RRH and TH program that truly reflects the voices and experiences of those it serves. This commitment to collaboration will not only enhance the program's effectiveness but also empower survivors in their journey toward healing and stability.

4B. Attachments Screen For All Application Questions

We have provided the following guidance to help you successfully upload attachments and get maximum points:

1. You must include a Document Description for each attachment you upload; if you do not, the Submission Summary screen will display a red X indicating the submission is incomplete.
2. You must upload an attachment for each document listed where 'Required?' is 'Yes'.
3. We prefer that you use PDF files, though other file types are supported—please only use zip files if necessary. Converting electronic files to PDF, rather than printing documents and scanning them, often produces higher quality images. Many systems allow you to create PDF files as a Print option. If you are unfamiliar with this process, you should consult your IT Support or search for information on Google or YouTube.
4. Attachments must match the questions they are associated with.
5. Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process.
6. If you cannot read the attachment, it is likely we cannot read it either.
 . We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time).
 . We must be able to read everything you want us to consider in any attachment.
7. After you upload each attachment, use the Download feature to access and check the attachment to ensure it matches the required Document Type and to ensure it contains all pages you intend to include.
8. Only use the "Other" attachment option to meet an attachment requirement that is not otherwise listed in these detailed instructions.

Document Type	Required?	Document Description	Date Attached
1C-7. PHA Homeless Preference	No	1C-7. PHA Homeles...	10/22/2024
1C-7. PHA Moving On Preference	No	1C-7. PHA Moving ...	10/22/2024
1D-10a. Lived Experience Support Letter	Yes	1D-11a. Lived Exp...	10/28/2024
1D-2a. Housing First Evaluation	Yes	1D-2a. Housing Fi...	10/15/2024
1E-2. Local Competition Scoring Tool	Yes	1E-2. Local Compe...	10/21/2024
1E-2a. Scored Forms for One Project	Yes	1E-2a. Scored For...	10/28/2024
1E-5. Notification of Projects Rejected-Reduced	Yes	1E-5. Notificatio...	10/13/2024
1E-5a. Notification of Projects Accepted	Yes	1E-5a. Notificati...	10/13/2024
1E-5b. Local Competition Selection Results	Yes	1E-5b. Local Comp...	10/13/2024
1E-5c. Web Posting—CoC-Approved Consolidated Application	Yes		
1E-5d. Notification of CoC-Approved Consolidated Application	Yes		

2A-6. HUD's Homeless Data Exchange (HDX) Competition Report	Yes	2.A.6 HUD HDX Co...	09/23/2024
3A-1a. Housing Leveraging Commitments	No	3A-1a. Housing Le...	10/23/2024
3A-2a. Healthcare Formal Agreements	No	3A-2a. Healthcare...	10/16/2024
3C-2. Project List for Other Federal Statutes	No		
Other	No		

Attachment Details

Document Description: 1C-7. PHA Homeless Preference

Attachment Details

Document Description: 1C-7. PHA Moving On Preference

Attachment Details

Document Description: 1D-11a. Lived Experience Support Letter

Attachment Details

Document Description: 1D-2a. Housing First Evaluation

Attachment Details

Document Description: 1E-2. Local Competition Scoring Tool

Attachment Details

Document Description: 1E-2a. Scored Forms for One Project

Attachment Details

Document Description: 1E-5. Notification of Projects Rejected -Reduced

Attachment Details

Document Description: 1E-5a. Notification of Projects Accepted

Attachment Details

Document Description: 1E-5b. Local Competition Selection Results

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: 2.A.6 HUD HDX Competition Report

Attachment Details

Document Description: 3A-1a. Housing Leverage Commitments

Attachment Details

Document Description: 3A-2a. Healthcare Formal Agreements

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. CoC Identification	09/17/2024
1B. Inclusive Structure	10/28/2024
1C. Coordination and Engagement	10/28/2024
1D. Coordination and Engagement Cont'd	10/28/2024
1E. Project Review/Ranking	10/28/2024
2A. HMIS Implementation	10/27/2024
2B. Point-in-Time (PIT) Count	10/27/2024
2C. System Performance	10/27/2024
3A. Coordination with Housing and Healthcare	10/27/2024
3B. Rehabilitation/New Construction Costs	10/27/2024
3C. Serving Homeless Under Other Federal Statutes	10/27/2024

4A. DV Bonus Project Applicants	10/28/2024
4B. Attachments Screen	Please Complete
Submission Summary	No Input Required

**1C -7. PHA Homeless Preference and 1C – 7a. PHA Moving On Preference
COVER**

**This attachment contains: Homeless Preference and Moving on Preference Documents for the
largest PHAs in CA601 – San Diego City and County CoC
and City of Carlsbad, a formal partner with the CoC**

PHA CA063 San Diego Housing Commission

Administrative Policies

Rental Assistance

2024-25 Move to Work Annual Plan Content

Document Pages found in Attachment 1C-7a. Moving On Preference

PHA CA108 Housing Authority of the County of San Diego

Administrative Policies

Limited Preference for CoC Referrals

PHA CA077 - Carlsbad Housing and Homeless Services

Preference Policies and Partnership Agreement

Fiscal Year 2024 Continuum of Care Program Competition – Homeless Preference

San Diego Housing Commission (CA-063)

SDHC Section 8 Administrative Plan, Admissions and Continued Occupancy Policy for Housing, and MTW Administrative Plan -Amended. Because the documents are extensive, highly relevant homeless preference and admissions sections are highlighted. Sections related to homelessness include:

SDHC Section 8 Administrative Plan

- Chapter 2 – Waiting List, Admission, and Denial of Admission
 - G. WAITING LIST ORDER [24 CFR 982.204]
 - H. SPECIAL ADMISSIONS [24 CFR 982.54(d), 982.203]
 - I. RANKING LOCAL PREFERENCES
 - J. INITIAL DETERMINATION OF LOCAL PREFERENCE
 - K. CHANGE OF PREFERENCE [24 CFR 982.207]
 - W. FAMILY COMPOSITION [24 CFR 982.201]
- Chapter 3 – Verification, Income, Assets, and Allowances
 - F. VERIFICATION OF PREFERENCES [24 CFR 5.410-5.430]
- Chapter 14 – Special Programs
 - SECTION 1: MOVING TO WORK - PROJECT BASED VOUCHER PROGRAM
 - SECTION 2: VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH)
 - SECTION 3: SPONSOR-BASE SUBSIDIES (SBS) FOR THE HOMELESS
 - SECTION 6: TRANSITIONAL PROJECT BASED SUBSIDIES FOR THE HOMELESS
 - SECTION 8: GUARDIAN SCHOLARS PROGRAM
 - SECTION 10: LOCAL NON-TRADITIONAL ACTIVITIES IMPLEMENTED UNDER MTW
 - **SECTION 11: THE MOVING ON PROGRAM**
 - SECTION 12: MAINSTREAM VOUCHERS
 - SECTION 13: EMERGENCY HOUSING VOUCHER (EHV) PROGRAM

SDHC Admissions and Continued Occupancy Policy for Housing

- PART III: TENANT SELECTION
 - 4-III.B. SELECTION METHOD
 - Local Preferences [24 CFR 960.206]
- PART II: VERIFYING FAMILY INFORMATION
 - 7-II.H. VERIFICATION OF PREFERENCE STATUS

Moving to Work Administrative Plan



SAN DIEGO HOUSING COMMISSION ADMINISTRATIVE PLAN (Section 8)

A. INTRODUCTION

The Section 8 Program was enacted as part of the Housing and Community Development Act of 1974, which recodified the U.S. Housing Act of 1937. The Act is and has been amended from time to time, and its requirements, as they apply to the Section 8 tenant-based assistance program, are described in and implemented throughout this Administrative Plan. The Section 8 rental assistance programs are federally funded and administered for the City of San Diego by the San Diego Housing Commission (SDHC) through its Rental Assistance Division.

Administration of the Section 8 Program and the functions and responsibilities of SDHC staff shall comply with SDHC's Personnel Policy and the Department of Housing and Urban Development's (HUD) Section 8 regulations as well as all federal, state and local Fair Housing laws and regulations.

The jurisdiction of the SDHC is the City of San Diego, California.

B. MTW

On January 14, 2009, HUD approved the SDHC as a Moving to Work agency. The Moving to Work (MTW) demonstration program allows public housing authorities (PHA's) to design and test various approaches for providing and administering housing assistance. The Department of Housing and Urban Development's three main objectives of the program are to:

1. Reduce cost and achieve greater cost effectiveness in Federal expenditures;
2. Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and
3. Increase housing choices for low-income families.

Locally, the Moving to Work program is known as "MTW." Throughout this document, there are policy references to MTW. These policies only apply to vouchers that qualify to be administrated under the Moving to Work program. Unless noted otherwise, all other policies in this plan apply to MTW vouchers and other voucher programs.

SDHC's portfolio of units that are not part of the MTW program are designated by HUD.



The composition of the new families, and whether they include elderly or disabled members.

Whether domestic violence was involved in the breakup.

Recommendations of reliable, knowledgeable third-party professionals.

Upon request of SDHC, documentation of these factors will be the responsibility of the family. If documentation is not provided, SDHC will deny eligibility based on failure to provide information necessary for the eligibility determination.

G. WAITING LIST ORDER [24 CFR 982.204]

Except for Special Admissions, applicants will be selected from SDHC waiting list in accordance with policies, preferences and income targeting requirements defined in this Administrative Plan. SDHC will maintain information that permits proper selection from the waiting list.

H. SPECIAL ADMISSIONS [24 CFR 982.54(d), 982.203]

If HUD awards SDHC program funding that is targeted for specifically named families, SDHC will admit these families under a Special Admission procedure.

Special admissions families will be admitted outside of the regular waiting list process. They do not necessarily have to qualify for any preferences, nor are they required to be on the program waiting list. SDHC maintains separate records of these admissions.

The Opt Out Conversions are examples of such special admissions.

I. RANKING LOCAL PREFERENCES

Within each of the following numbered categories, applicants will be served by date and time of application.

1. Applicants who live and/or work in the City of San Diego and who are families of two or more people that include a dependent, or individuals who are disabled or age 62 or older, or veterans, or active U.S. Service Person, or a homeless person with a disability, or a non-elderly person (under the age of 62) with a disability.
2. Other applicants who live and/or work in the City of San Diego.
3. Applicants who do not live and/or work in the City of San Diego and who are families of two or more people that include a dependent, or individuals who are disabled or age 62 or older, or veterans, or active U.S. Service Person, or a homeless person with a disability, or a non-elderly person (under the age of 62) with a disability.
4. Other applicants who do not live and/or work in the City San Diego.



J. INITIAL DETERMINATION OF LOCAL PREFERENCE

An applicant's certification that they qualify for a preference will be accepted without verification at the initial application. When the family is selected from the waiting list for the final determination of eligibility, the preference must be verified.

If the preference verification indicates that an applicant does not qualify for the preference, the applicant will be returned to the waiting list without the local preference, with their original date and time of application.

K. CHANGE OF PREFERENCE [24 CFR 982.207]

Changes in an applicant's circumstances while on the waiting list may affect the family's entitlement to a preference. Applicants are required to notify SDHC using the Waiting List Applicant Portal when their circumstances change.

L. CROSS LISTING OF PUBLIC HOUSING AND SECTION 8

SDHC will not merge the waiting lists for Public Housing and Section 8.

M. PREFERENCE DENIAL

If SDHC denies a preference, SDHC will notify the applicant in writing of the reason(s) why the preference was denied and offer the applicant an opportunity for a review with a staff member other than the one who made the decision. If the preference denial is upheld because of the review, or the applicant does not request a review, the applicant will be placed on the waiting list without benefit of the preference, with their original date and time of application.

If the applicant falsifies documents or makes false statements in order to qualify for any preference, they will be removed from the associated waiting list.

N. REMOVAL FROM WAITING LIST AND UPDATE [24 CFR 982.204(c)]

The wait list will be updated periodically as needed to ensure a viable list of applicants. The mailing will ask for confirmation of continued interest.

If an applicant is removed from the waiting list for failure to respond, they will not be entitled to reinstatement unless SDHC determines there were circumstances beyond the applicant's control.

If an applicant fails to respond to any mailings, which require a response, the applicant's name will be dropped from the waiting list without further notice.



Once a waiting list is open, SDHC will accept on-line applications from eligible applicants unless there is good cause for not accepting the application, such as denial of assistance because of action or inaction by members of the family for the grounds stated in the “Program Terminations and Program Integrity Unit” chapter of this Administrative Plan.

Applications will be accepted up to the close of business on the date announced in the public notice. For the purpose of this Administrative Plan, applications that are post marked on or before the closing date will be accepted.

At no time will an application that is submitted by U.S. Mail be accepted later than 10 calendar days after the closing date of the waiting list.

The SDHC does not accept any liability or responsibility for applications that are lost and/or misdirected by the U.S. Post Office.

The open period shall be long enough to achieve a waiting list adequate to cover projected turnover and new allocations over the next 24 months.

The SDHC will give at least seven days' notice prior to closing the list.

Upon request from a person with a disability, additional time will be given as an accommodation for submission of an application after the closing deadline. This accommodation is to allow persons with disabilities the opportunity to submit an application.

P. SELECTION FROM WAITING LIST [24 CFR 982.204]

When funding is available, families will be selected from the waiting list in their preference-determined sequence, regardless of family size.

When a family has been selected from the waiting list, they must be prepared at that time to begin the eligibility process. If the family is unable to begin the process, the family will be dropped from the waiting list and may reapply.

If a family does not respond to a selection letter, the family will be dropped from the corresponding waiting list.

Families may request reinstatement, through an administrative review process, up to 12 months after being dropped from a waiting list. Extenuating circumstances will be evaluated on a case-by-case basis.

Q. INCOME LIMITATIONS/INCOME TARGETING [24 CFR 982.201(b), 982.353]

Seventy five percent (75%) of new admissions shall not exceed 30% of the Area Median Income (AMI) as established by HUD. The remaining 25% may be between 31-80% of the AMI.

Meeting the income targeting requirements will require skipping higher income families on the waiting list as necessary to satisfy HUD's annual targeting requirement.



be scheduled for a briefing where they will receive a voucher and an orientation to the housing program.

V. ELIGIBILITY FACTORS [982.201]

SDHC accepts applications only from families whose head or spouse is at least 18 years of age or emancipated minors under State law. To be eligible for participation, an applicant must meet HUD's criteria, as well as any permissible additional criteria established by SDHC.

HUD eligibility criteria are:

An applicant must be a "family";

An applicant must be within the appropriate Income Limits;

An applicant must furnish Social Security Numbers for all family members;

An applicant must furnish declaration of Citizenship or Eligible Immigrant Status and verification when required;

Reasons for denial of admission are addressed in the "Terminations and Program Integrity Unit" chapter. These reasons for denial constitute additional admission criteria.

Evidence of Citizenship/Eligible Immigrant Status will not be verified until the family is selected from the waiting list for final eligibility processing for issuance of a Voucher.

W. FAMILY COMPOSITION [24 CFR 982.201]

The applicant must qualify as a Family. A Family may be a single person or a group of persons.

A Family includes:

A family with a child or children.

Two or more persons living together that include a dependent, or one or more elderly or disabled persons living with a live-in aide.

SDHC determines if any other group of persons qualifies as a family.

A single-person family may be:

An elderly person

A homeless person with a disability

A veteran, or active U.S. Service Member who have served in active military for least four (4) months or longer and who shall have been released under conditions other than dishonorable, bad conduct or court martial.

A person with a disability. Individuals may not be considered disabled for eligibility purposes solely based on any drug or alcohol dependence.



SDHC will conduct searches in the Enterprise Income Verification (EIV) system related to Debts Owed to PHAs & Terminations and Verification Reports to avoid providing duplicate rental assistance to families already assisted.

If any applicant misrepresents the information on which eligibility or tenant rent is established, SDHC may deny assistance and may refer the family file for appropriate disposition.

The family must not have been terminated for violating any family obligation during a previous participation, within the last 10 years, in the Section 8 program prior to final eligibility determination.

SDHC will deny program admission to applicants if any member of the family has a present ownership interest in a suitable home for which they have the legal right to reside and legal authority to sell, unless the home is being purchased with a voucher or the family includes a person who is a victim of domestic violence or is offering the home for sale. This policy is not applicable to families with a mobile home.

AA. TENANT SCREENING [24 CFR 982.307]

SDHC will take into consideration any of the criteria for admission described in the "Denial or Termination of Assistance" chapter.

SDHC will not screen family behavior or suitability for tenancy. SDHC will not be liable or responsible to the landlord or other persons for the family's behavior or the family's conduct in tenancy.

The landlord is responsible for screening families based on their tenancy histories.

BB. CHANGES PRIOR TO EFFECTIVE DATE OF THE CONTRACT

Changes in eligibility that occur during the period between issuance of a voucher and lease up may affect the family's eligibility or share of the rental payment.

CC. INELIGIBLE FAMILIES

Families who are determined to be ineligible will be notified in writing of the reason for denial and given an opportunity to request an administrative review, or an informal hearing if they were denied due to non-citizen status. See "Terminations and Program Integrity Unit" chapter for additional information about reviews and hearings.



Family members requesting to consent to the release of specific information may be provided with a copy of the appropriate forms for their review and signature, if requested.

It is a family obligation to supply any information and sign consent forms requested by SDHC or HUD. Family refusal to cooperate may result in denial of admission or termination of assistance.

E. ITEMS TO BE VERIFIED [24 CFR 982.516]

The following items will be verified at recertifications, except when superseded by MTW policies:

- All income not specifically excluded by the regulations.

- Full-time student status.

- Child care expense when it allows an adult family member to be employed, to further their education, or to seek employment.

- Medical expenses

- Disability assistance expenses that allow an adult family member to be employed. This includes only those costs associated with attendant care or an auxiliary apparatus for a disabled member of the family.

- Familial or marital status when needed for head or spouse definition.

The following items will be verified at mandatory recertification, based on a licensed doctor or a health care professional's certification of how long the condition will continue:

- Disability for determination of preferences, allowances or deductions.

- The need for a live-in aide and other types of reasonable accommodation.

In addition to the above, the following items will be verified when determining eligibility and when adding household members, including live-in aides:

- Preference status (when determining eligibility only).

- Picture Identification for all adults (age 18 or older) including live-in aides.

- U.S. citizenship/eligible immigrant status.

- Social Security Numbers for all family members over six years of age or older who have been issued a social security number.

- History of criminal activity, illegal drug activity and alcohol abuse.

F. VERIFICATION OF PREFERENCES [24 CFR 5.410-5.430]

All preferences must be verified.

1. Live or Work in the City of San Diego



Copy of Lease Agreement and three most recent rent receipts, canceled checks or money order receipts.

A California driver's license or California ID in conjunction with copies of recent bills sent to the address.

Copy of paycheck stubs that indicate the location of the place of employment or third-party verification that indicates the place of employment.

2. Verification of "Homeless" in the City of San Diego:

SDHC uses HUD's Category 1 definition of literal homelessness that include the following:

1) Moving from an emergency shelter; or

2) Moving from transitional housing; or

3) Currently Homeless, which means:

a) An individual who lacks a fixed, regular, and adequate nighttime residence; or

b) An individual who has a primary nighttime residence that is:

i) A supervised publicly or a privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and Transitional Housing for the mentally ill); or

ii) An institution that provides temporary residence for individuals intended to be institutionalized; or

iii) A public or private place not designated for, or ordinarily used as, a regular sleeping accommodation for human beings.

A Certification of Homelessness is required to be completed by a third party that is a public or private facility that provides shelter for homeless persons, any social service agency that provides services for homeless persons, or a local Police Department.

3. Veteran

DD214 discharge document.

Letter from the Veteran's Administration verifying the branch of service, date and place of discharge and type of discharge.

4. Family of a Veteran

One of the above forms of verification must be provided for the veteran and familial status verified as follows:

Marriage certificate or license.

If veteran is deceased and the spouse has not remarried, a copy of the marriage certificate/license and a copy of the veteran's death certificate.



Social Security Card

Department of Motor Vehicles California ID

Acceptable verification for minors includes:

Certificate of Birth

Acceptable USCIS documents

Adoption papers

Custody agreement

Health and Human Services ID

School records

U. S. passport

2. Verification of Marital Status

Verification of divorce status must be a certified copy of the divorce decree, signed by a Court Officer.

Verification of a separation may be a copy of court-ordered maintenance or other records.

Verification of marriage status is a marriage certificate.

3. Familial Relationships

The definition of “family” includes but is not limited to:

A family with or without children (a child temporarily absent from the home due to placement in foster care shall still be considered in determining family composition and family size);

An elderly family;

A disabled family;

A displaced family;

The remaining member of a family;

A single person who is not elderly, disabled, or displaced; and

Effective 1/1/2025, an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan describe in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older



SECTION 1: MOVING TO WORK - PROJECT BASED VOUCHER PROGRAM

A. INTRODUCTION

Utilizing the flexibility the Moving to Work (MTW) program provides, SDHC established a Project-Based Voucher (PBV) Program that will serve the needs of San Diego's low-income residents, with a focus on the homeless population who are in need of housing, while also serving the needs of the community.

SDHC uses the following MTW flexibilities and strategies to increase housing choice in San Diego:

1. Collaborate with local developers and non-profit housing providers by creating long-term subsidies by means of project-based vouchers, in exchange for the creation of affordable housing for designated low-income populations. The provision of supportive services may be required in the PBV development.
2. Designate greater than 20% of SDHC's voucher allocation as PBV with a maximum allotment of five 5% of total vouchers authorized as PBV per year.
3. Expand the use of project-based vouchers by increasing the permissible percentage of subsidized units in a single development from 25% to 100%. The number of designated PBV units in a contract may increase outside of the initial term of the contract.
4. In conjunction with programs such as the Neighborhood Stabilization Program, SDHC may apply creative measures utilizing project-based vouchers to increase housing opportunities in vacant and foreclosed properties in the community.
5. Allow for project-specific waiting lists maintained by the owners or non-profit providers in compliance with agency standards.
6. SDHC and/or the developer may require the resident to participate in supportive services as a condition of tenancy.

The selected partners are authorized to conduct initial and on-going eligibility determinations while assisting the residents with completing paperwork and gathering verification documents. SDHC recognizes certain confidential verification sources, such as EIV, are not accessible to the partnering agencies. For this reason, SDHC will continue to generate and analyze these types of documents and reports. In such instances, the finalized packets are forwarded to SDHC staff for review, final eligibility determination, certification processing, quality control auditing, and submission of the HUD-50058.

SDHC maintains responsibility for calculating the tenant's rent portion. The rent calculation methodology utilized for PBV participants parallels the calculation used for tenant-based voucher participants including the application of rent reform activities designed under the MTW program.

B. PROJECT-BASED VOUCHER POLICY



1. Annual Review of Project-Based Voucher Program

SDHC shall review its portfolio of available vouchers each year to establish priorities for the project-based voucher program for the upcoming year and determine the number of vouchers to be issued.

SDHC shall design an appropriate allocation process consistent with the annually established priorities and total number of vouchers available for the project-based voucher program for that year.

2. Qualified Agencies

Agencies qualified to participate in the project-based voucher program must either be:

A non-profit or for-profit corporation with a mission to provide housing and/or services to low-income and/or homeless families and individuals; or

A division of city or county government mandated to provide direct service to very low-income and/or homeless families and individuals.

Note: *The competitive/non-competitive voucher award process will specify the population to be served within the development where project-based vouchers are awarded.*

3. Owner Proposal Selection

SDHC will select owner proposals through a competitive Request for Proposal (RFP) process. Specifically, the SDHC will advertise online that it will accept applications for PBV assistance. The advertisement will specify the number of PBV units that will be available.

Additionally, in accordance with regulations at 24 CFR 983.51, SDHC may select, without competition, a proposal for housing assisted under a federal, State, or local government housing assistance, community development, or supportive services program that required competitive selection of proposals (e.g., HOME, and units for which competitively awarded low-income housing tax credits (LIHTCs) have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three (3) years of the PBV proposal selection date, and the earlier competitively selected housing assistance proposal did not involve any consideration that the project would receive PBV assistance.

The PHA may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an Agreement. The SDHC may restrict applications to any or all housing types at its discretion. The housing types are defined below:

Existing housing: A housing unit is considered an existing unit for purposes of the PBV program, if at the time of notice of PHA selection the units *substantially comply* with HQS.

(1) Units for which rehabilitation or new construction began after owner's proposal submission but prior to execution of the AHAP do not subsequently qualify as existing housing.

(2) Units that were newly constructed or rehabilitated in violation of program requirements also do not qualify as existing housing.



evidence that the environmental review has been performed by a qualified entity or, where applicable, documentation that the project is categorically excluded from review under the National Environmental Policy Act (NEPA).

6. Designated Service Providers

Organizations and agencies awarded Project-based vouchers to assist the homeless and other specialized populations must execute a Memorandum of Understanding (MOU) with SDHC, in which the agency commits to providing specific services to their clients receiving assistance. The agency must establish a rational, fair, and auditable selection process for applicable projects. This process should be related to the goals of the project-based voucher program, which does not discriminate against any applicant on the basis of membership in a protected class, and which does not violate any SDHC conflict of interest policy. The agency must agree to periodic audits by SDHC of its selection process.

SDHC will require verification of supportive services offered to families. Participation in services is not a condition of tenancy for the families. Providers are required to attempt to reengage families who are not participating in services. SDHC will audit providers to verify that services are being offered and reengagement of services is occurring.

7. Designated Service Provider Waiting List

Non-profit and for-profit owners, who are designated by the SDHC as a service provider, may be allowed to establish their own Project-Based waiting list, with written consent from the SDHC. The waiting list would be subject to requirements specified in the Housing Assistance Payment Contract and/or applicable agency/owner agreements. To qualify as a designated service provider, the non-profit or for-profit owner must provide housing and supportive services to a specified population that could not be easily identified using the established SDHC waiting list. Such populations may include, but are not limited to; Victims of Domestic Violence, former Foster Care youth and/or recovering drug addicts with more than one additional disability. The SDHC will require compliance for any supportive services obligations entered into by the family where supportive services are provided.

Requests to be included as a designated service provider will be reviewed on a case-by-case basis. Inclusion will be contingent upon compelling documentation showing why the SDHC maintained waiting list would not be sufficient due to the population served and the services provided.

Once approved as a designated service provider, the site-based wait list must be preapproved by the SDHC and is subject to audits as determined necessary by SDHC.

8. Coordinated Entry System (CES) System Participation

The CES system is required in PBV developments serving homeless populations.

Owners will participate in CES as established by the San Diego Regional Continuum of Care (CoC). Owner will adhere to the following criteria:



Homeless eligibility is based on HUD's Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act literally homeless (Category 1) definition and obtaining homeless verification through a third party.

Projects must utilize the CES standardized vulnerability assessment tool in the program's screening, referral and admissions processes for all participants.

Projects admissions will be prioritized based upon local standards, level of acuity and overall vulnerability determined via the common assessment tool.

Project staff will actively participate in Housing Navigation, Case Conferencing and /or other integral components of CES.

Owners will participate in Commission sponsored Provider Roundtables on a regular basis.

Additional resources and information pertaining to performance, Homeless Management Information System (HMIS), Continuum of Care and other topics relevant to Continuum of Care programs is available at www.hudexchange.info.

9. Homeless Management Information System (HMIS) Participation

Designated service provider(s) shall enter and maintain homeless client level data in the current approved HMIS as directed by the Regional Continuum of Care. The service provider(s) must obtain and report required programmatic information and data on a monthly basis. Data quality errors must be less than 10% of all program elements, listed on question 7 of the 0625 HUD Annual Progress Report (APR) available in Clarity.

In alignment with HUD, all homeless programming will adhere to Housing First principles as noted below:

Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.

Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Source: United States Interagency Council on Homelessness, <https://www.usich.gov/tools-for-action/housing-first-checklist>.

10. Non-Designated Service Providers/ Non-Service Providers

Non-profit and for-profit owners, who are not serving homeless populations, must use the established Project Based waiting list maintained by the SDHC. Owners have the ability to refer their prospective and current tenants to the Project Based waiting list; however, owners are required to select and rent vacant contract units to eligible families selected from the waiting list.



SDHC will send a referral list consisting of a sufficient number of families to fill the needed vacancies. When an owner receives a referral list, he/she must screen and select future tenants based on their specific rental requirements.

Previous referral(s) issued for the same vacancy may be used only within a 6-month period.

11. In-Place Families

When units are initially awarded project-based assistance and the selected unit(s) is occupied, SDHC will consider these families “in-place” and be given a selection preference for the now-assisted unit. The family will be scheduled for an intake interview and given the opportunity to demonstrate eligibility for the project-based voucher.

12. Eligibility for PBV Assistance

Families selected from the waiting list to participate in the MTW project-based voucher program may attend an intake interview and complete the intake process in order to be determined eligible for the program.

A preliminary eligibility determination may be conducted on-site by the owner or designated staff according to the HAP contract and the signed agreement between SDHC and the owner. Applicants for the project-based assistance program must meet the same initial eligibility requirements as applicants for the tenant-based voucher program, unless otherwise stated in the HAP contract and/or applicable agency/owner agreements, such as the MOU. The SDHC Administrative Plan supersedes agency/owner agreements.

The head of household and all adult family members 18 years and older must sign a Statement of Family Obligations that contains all of the family responsibilities under the Housing Choice Voucher program. Failure by the family to fulfill the Statement of Family Obligations may result in the family being terminated from the project-based voucher program.

SDHC will use abundant discretion when considering eligibility criteria, including criminal history, for vouchers that are associated with homeless initiatives.

13. Ongoing Eligibility

The landlord/service provider may be required to assist participants with completing the biennial recertification process. The landlord/service provider may schedule a biennial on-site interview to assist their participants with the completion of necessary recertification forms, gathering of documents, required income and allowance verifications as stated in applicable agency/owner agreements.

Final eligibility and rent portion determinations will be completed by SDHC staff.

File audits will be conducted on regular basis for project-based voucher files.

A participant already receiving PBV assistance may not qualify for another PBV project.

14. Occupancy Standards



received a HUD waiver to administer the HUD-VASH vouchers similarly to MTW vouchers. The HUD-approved MTW fiscal year 2013 Annual Plan included the following policies designed specifically for the HUD-VASH vouchers:

Any adults the VASH applicant/participant requests to add to his or her household will have a modified initial requirement for criminal history: no violent or drug-related criminal activity in the two years preceding application.

Minimum rent may be set at zero for the first 12 months of program participation. After the first 12 months, minimum rent shall be set at \$50.

Income garnishments that VASH participants experience may not be counted as income for the first 12 months of program participation.

To coincide with SDHC's rental assistance program administration, utility reimbursements will not be a part of the SDHC VASH program.

To coincide with SDHC's rental assistance program administration, VASH participants will be eligible for the biennial inspection cycle. The same criteria by which the general rental assistance program participants gain admission to the cycle must also be met.

The Moving to Work full time student definition, as described in Chapter 3 – Verifications, Assets, Income and Allowances of this document will be applicable.

While SDHC is required to waive some eligibility factors, all household members (including the veteran) will be held to the same standard as any other Housing Choice Voucher program participant once on the program.

SDHC will conduct a full recertification of household income, deductions, allowances, and family composition biennially. HQS Inspections are conducted on a biennial cycle.

The affordability cap for veteran families is 50% of their adjusted income.

For all other policies, the SDHC has adopted the published guidelines and has developed separate policy documents for VASH.

If VASH are Project Based, guidelines as contained in federal register publication FR-5976-N-03 "Housing Opportunity Through Modernization Act of 2016: Implementation of Various section 8 Voucher Provisions" will be adhered to.

SECTION 3: SPONSOR-BASE SUBSIDIES (SBS) FOR THE HOMELESS

SDHC provides subsidies to house homeless persons while sponsor organizations provide the necessary services. A typical sponsor is an organization providing supportive services to disabled individuals and/or individuals with substance abuse issues and requires additional housing resources to serve more clients. Sponsors may be both non-profit and for-profit agencies. Developers may also qualify as a sponsor if a service provider is contracted to render appropriate supportive services.



Sponsor Selection: SDHC engages in a competitive solicitation processes to select prospective non-profit and for-profit sponsors. If the process does not solicit an adequate response, SDHC will select sponsors without a competitive process. Additionally, SDHC may award sponsor-based subsidies to SDHC-owned developments using a non-competitive process.

In the event SDHC intends to serve a highly specialized population wherein only one service provider possesses the capability, expertise, and resources to serve the target population, SDHC may award sponsor-based subsidies without a competitive process.

Populations Served: The program serves homeless populations, and other designated populations as determined by SDHC. Subsidies will also be used to create assisted living housing for individuals/families requiring direct medical care or recently released from a medical institution.

Waiting Lists: Utilization of the Coordinated Entry System (CES) is required for homeless populations, when applicable. SBS programs identified by SDHC will be required to provide, in lieu of a CES match, proof of program enrollment in clarity. With SDHC permission, a sponsor agency may create and maintain a site-based waiting list under unique circumstances to serve specialized populations.

Inspections: SDHC conducts biennial Housing Quality Standards (HQS) inspections for each unit leased by a SBS program participant.

Administration: Sponsors provide program administration, including all eligibility and income determinations, rent calculations, interim and biennial certifications. Generally, the rent calculation method uses 28.5 percent of gross monthly income to generate the client's rent portion and resulting subsidy payment. A minimum rent of \$25 applies to the program. As determined appropriate, SDHC may apply the Path to Success calculation to ensure work-able participants are incentivized to progress towards self-sufficiency.

When a subsidy provides rental assistance for an individual bed rather than a unit, the maximum assistance for the bed will be determined according to the unit size, number of participants, and rent reasonableness determinations. The overall per bed subsidy in a given unit will not exceed the current SDHC payment standards for the unit size.

The sponsors will be required to create a program plan defining eligibility factors, leasing requirements, and termination policies and procedures. Sponsors will develop written service protocols and define methods of client management. A written service plan will be maintained for each participant in the SBS program.

Unit and Development Structures: Sponsor-based subsidies allow the rental assistance to be attached to a sponsoring agency. In the SBS program, the sponsor may utilize a tenant-based or project-based approach. A sponsor may also utilize sponsor-owned units for purposes of the program. Master leasing units within a development remains an option.

Monitoring: SDHC provides program oversight and evaluation and monitors the sponsor for compliance with program requirements. SDHC may conduct audits of the Coordinated Entry System (CES) utilization or waitlists, HMIS participation, rent calculation, tenant files, the administration of supportive service requirements, and any other items as determined necessary by SDHC.



SECTION 6: TRANSITIONAL PROJECT BASED SUBSIDIES FOR THE HOMELESS

The Transitional Project Based Subsidies for the Homeless program will be a short-term, transitional housing program using flat-subsidy project-based subsidy paired with supportive services, offered by the selected provider agency.

Waiting Lists: The service-providing agency will utilize the CES, a referral system, or create and maintain a site-based waiting list, which will comply with Fair Housing Laws. SDHC will audit this list to ensure compliance. Program participants will be encouraged to apply for and remain on SDHC tenant-based waiting list in order to transfer to the tenant based voucher program.

Inspections: The units will be required to pass a modified HQS inspection. All units will be inspected annually or biennially depending on the condition of the project.

Administration: Auditing will be conducted by SDHC. SDHC may provide training, including working with the supportive services agency staff to conduct a streamlined intake process, collecting vital information and documents for the purposes of verifying identification, homelessness status, and modified criminal history requirements, to ensure all requirements are met. The intake and exit information will be provided to SDHC who will maintain vital data on each unit and its occupants to provide to HUD. The supportive service agency will also be required to submit annual reports to SDHC with information on occupancy per unit and program participation. The report template will be provided by SDHC to the partner agency.

Partner Selection: Project based subsidy for these programs will be awarded on a competitive basis. The exception will be if the program is housed in an SDHC-owned development, in which case the subsidy will be awarded non-competitively, per a prior HUD-approved MTW activity.

Program Plan: Each partner agency will be required to create a program plan containing the program requirements such as minimum occupancy requirements to receive subsidy. Refer to the HUD-approved Fiscal Year 2013 MTW Annual Plan for a comprehensive program description.

SECTION 7: FLAT SUBSIDIES FOR YOUTH AGING OUT OF THE FOSTER CARE SYSTEM

SDHC provides flat housing subsidies to a partnering agency delivering supportive services such as job placement, education, training, and case management. The housing subsidy program funds individual beds based on the unit size, number of participants, and rent reasonableness determinations. The housing subsidies and continued support offered through the partnering agency enable youth currently aging out of the foster care program to build on previous achievements, create new opportunities for successes, and experience positive outcomes.

The anticipated duration of the program is three years per participant, but will not exceed a total of five years per participant. The additional two years serves as a safeguard in the event the participant has not achieved stability as defined by the partnering agency. For this reason, a hardship policy is unnecessary. Participants are eligible for a tenant-based voucher upon termination of the time-limited program participation.



Partner Selection: SDHC will publish a Request for Qualifications/Proposals to select partnering agencies. If the process does not solicit an adequate response, SDHC will select partners based on a non-competitive process.

Waiting Lists: The partnering agency creates and maintain a site-based waiting list, which will be in compliance with Fair Housing Laws.

SDHC will audit the waiting list to ensure program compliance. The Coordinated Assessment Housing Placement methodology may be required in lieu of a waitlist.

Inspections: The units are required to pass HQS inspection at initial occupancy and on an annual basis.

Administration: The partnering agency is responsible for performing the administrative functions of the program including: Managing the waiting list, determining initial and ongoing eligibility, and program terminations. SDHC will work with the partnering agency's staff to create a streamlined intake process involving the collection of vital information and documents for the purposes of reviewing eligibility criteria, verifying identification, and utilizing modified criminal history requirements. Ongoing support related to streamlined recertification processes and rent calculations will be available to partnering agencies. Program auditing is conducted by SDHC. The supportive service agency are required to submit frequent reports to SDHC with relevant information concerning program participation and outcomes. Program participants will not be eligible for a tenant-based voucher at the conclusion of participation on the program.

SECTION 8: GUARDIAN SCHOLARS PROGRAM

The Guardian Scholars Program at San Diego State University (SDSU) provides resources to students either exiting the foster care system, under legal guardianship, designated as wards of the court, or unaccompanied homeless youth. The Educational Opportunity Program (EOP) operated on the SDSU campus provides the Guardian Scholars with an array of resources in an effort to support the students and ensure academic success. As a component of the program, Guardian Scholars reside in campus-supported housing during and between semesters. The holistic approach removes barriers for a historically underserved population and increases the probability of completing post-secondary education. Currently, the program has a 95% graduation success rate.

The Guardian Scholars Program ensures an affordable education is accessible for the participating students. Using a Federal formula, a student's education is funded according to tiers: Financial aid and government grants are applied to the student's expenses, first funding the tuition, fees, books, meal plans, and finally the campus housing. Often, the funding resources are exhausted before the housing component is subsidized. The result is the student must rely on loans to fund the housing. The Guardian Scholars Program is in part supported through philanthropy to assist with reducing the student's reliance on loans, but a funding gap exists despite significant philanthropic support.

Housing subsidies issued by SDHC provide the financial support necessary for closing the funding gap for the student's housing expense. On an annual basis, SDHC provides \$200,000 to SDSU to fund the housing component of the Guardian Scholars Program. In addition, SDHC provides a dollar for dollar match to funds raised by SDSU through philanthropy, up to a maximum of \$400,000, to further assist



Work readiness

Job training and recruitment

Financial literacy

Parent effectiveness training and support groups

Administration: SDHC staff will determine eligibility, perform the subsidy calculations, process recertifications and interims.

Interest List: Monarch families interested in program participation must complete and submit an interest form to Monarch School. The Regional Task Force on the Homeless (RTFH) prioritizes the interest list in accordance with the eligibility matrix criteria provided to the Coordinated Entry System.

All participating families are entered into HMIS by Monarch School. The RTFH completes the prioritization process and matches a family to a Monarch subsidy when there is a vacancy. Once an application is received, the service provider gathers all required information/documents from the family to determine eligibility.

Eligibility Determination and Subsidy Calculation Methodology: The Monarch School Project provides rental assistance to homeless families on the condition that at least one minor (defined as ages 4 to 19) is attending Monarch School. Subsidies are calculated at 28.5% of monthly income amounts and the applicable payment standards. A minimum rent of \$25 applies to the program. Assets, deductions, expenses, and allowances, including the utility allowance, are not considered for purposes of calculating the subsidy. The initial subsidy is determined at program entry and re-determined biennially until the conclusion of program participation. SDHC provides initial monetary assistance, such as security deposits, to ensure families successfully lease a unit upon program admission. The assistance is in the form of a no-interest loan with low monthly repayments.

For purposes of initial eligibility, criminal history is not reviewed with the exception of sex offender status and manufacturing methamphetamines within federally funded properties. Federal and/or state registration as a sex offender precludes individuals from participating in the program. Participants are required to apply to the HCV tenant-based waitlist upon program admission. Participants do not automatically become eligible for a tenant-based voucher upon termination of program participation and must proceed through the waitlist process to obtain a Section 8 Housing Choice Voucher

Program Duration – Continued Occupancy: At least one minor must continuously remain enrolled at Monarch School for one full school year. If the family wishes to move within SDHC's jurisdiction and to a different school district, the family must engage with Monarch School case Manager to determine the appropriateness of transferring schools prior to the move and transfer.

Participation in the Monarch program shall continue until such time as the assistance payment amounts to zero for a period of six consecutive months. At that time, the family will no longer be eligible, and the HAP will be terminated. However, should the family go to zero HAP, for 180 consecutive days, SDHC reserves the right to extend the period past 180 days, should there be documented extenuating circumstances for an extension to the time period. Such documented extenuating circumstance include but is not limited to:

- Death in the family



- Loss of employment or income due to no fault of the family; and/or
- Documentation of a medical or financial hardship beyond the control of the family for a member of the assisted household

SDHC may deny assistance to applicants, or proposed additions to the family, and terminate assistance for participants for violations of any of the family responsibilities.

Transition Plan: When the last remaining child of the family has completed 12th grade and/or is no longer attending school continuously, SDHC and the assigned service provider will conduct an evaluation to determine the need and appropriateness of future rental assistance and supportive services that best meets the family's needs. Should the family need continued rental assistance, SDHC may provide housing subsidy and facilitate appropriate resources to meet the family's needs. Continued rental assistance is also dependent on SDHC funding.

Recertifications: Monarch families will be recertified on a biennial basis.

HQS Inspections: Inspections are conducted at program admission and biennially thereafter.

In the initial years of implementation, SDHC has recognized that a range of services is needed to ensure housing stability for this population.

SDHC will ensure families have access to the appropriate level of services and interventions, including permanent supportive housing (PSH).

SECTION 10: LOCAL NON-TRADITIONAL ACTIVITIES IMPLEMENTED UNDER MTW

In an effort to increase affordable housing opportunities, SDHC may provide funds to acquire, renovate and/or build units that are not Public Housing or Housing Choice Voucher units. SDHC may also develop Rental Subsidy Programs designed to address local needs like homeless/transitional housing programs. For local non- traditional activities, SDHC will biennially review compliance that eligible families are at or below 80% of AMI. SDHC will also monitor that the property is safe, decent, sanitary, and in good repair based on SDHC inspection protocol.

SECTION 11: THE MOVING ON PROGRAM

SDHC implemented the Moving On Program, a local, non-traditional program intended to serve formerly homeless persons transitioning out of permanent supportive housing who no longer require intensive supportive services to maintain housing stability. The Moving On Program initiative supports tenants who are successful in their recovery to live more independently using a Federal subsidy while accessing community-based resources, as needed. Additionally, the program frees up valuable permanent supportive housing and services for vulnerable homeless individuals in need of these resources.



Program Admission Process: SDHC will partner with local non-profits and other agencies to administer the program. Collaborators in this endeavor may include local agencies such as the County of San Diego Behavioral Health Services (BHS), and other agencies providing supportive services. However, any agency utilizing the Coordinated Entry System (CES) model to provide appropriate supportive services and housing to homeless persons may provide referrals for purposes of the Moving On Program. SDHC will seek guidance from San Diego's Regional Continuum of Care Council (RCCC) during the primary stages of implementation to ensure the program aligns with the region's efforts.

The Moving On waitlist will utilize date, time, and a Moving On preference as selection criteria for program applicants. To ensure eligibility for the Moving On preference, the partnering agency must assess candidates and provide referrals to SDHC for placement onto the Moving On waitlist with the Moving On preference selected. The candidate will also be required to apply to the Housing Choice Voucher waitlist at this time.

The assessment process will require utilization of a common assessment tool by the partner to ensure viable candidates are identified for the program. As Moving On subsidies become available, applicants are selected from the Moving On waitlist according to the date and time of the referral as well as the Moving On preference. The initial eligibility process requires verification of meeting the Moving On criterion. Applicants for whom the Moving On verification cannot be obtained will be denied eligibility. SDHC encourages case managers to assist with eligibility activities to ensure compliance with the process.

Administration: The waitlist selection, initial/ongoing eligibility, and termination processes are administered similar to Housing Choice Voucher requirements. For purposes of initial eligibility, reduced criminal history requirements will be applied. MTW flexibilities will be applied to Moving On subsidies.

Subsidy Calculation and Administration: MTW flexibilities will be used in the administration of the Moving On Program to streamline processes, thus ensuring efficiency and effectiveness. Subsidies will be calculated according to the Path to the Success rent calculation, MTW activity 2012-1. Rent reasonableness regulations, SDHC subsidy standard policies, and SDHC payment standards (including Choice Communities) will be applied to the Moving On program with applicable MTW flexibilities enacted.

Since move-in costs oftentimes serve as a barrier to prospective participants of the Moving On program, SDHC may elect to provide funds to assist with moving expenses such as utility deposits, security deposits, first month's rent, etc.

Biennial Recertifications: Moving On families will be recertified on a biennial basis.

HQS Inspections: Inspections will be conducted at new admission and biennially thereafter.

Supportive Services: Although participants of the Moving On program have demonstrated the ability to maintain stable housing, the stresses related to a transition into the Moving On program may cause a certain degree of relapse. For this reason, SDHC will require community providers to offer an appropriate level of supportive services through the transition and ongoing, as necessary, until stability is ensured. The service provider will remain available to the participant for the duration of



the program in the event of a full or partial relapse. The service provider will also be available to provide referrals to community resources to further ensure recovery and stabilization. Moving On participants will have access to SDHC's Achievement Academy, but participation in Achievement Academy activities is not mandatory. The Achievement Academy provides an array of work-readiness services, such as job placement and counseling, to ensure motivated rental assistance participants are able to obtain employment and increase financial self-reliance.

SECTION 12: MAINSTREAM VOUCHERS

The Mainstream Voucher Program provides tenant based vouchers for low-income households that include a non-elderly person with disabilities. SDHC Mainstream Voucher program provides vouchers to homeless and low-income families that include a non-elderly person with a disability between the ages of 18 - 61. The non-elderly person with a disability can be any household member.

Administration: Applicants for the Mainstream Voucher Program must be selected from the PHA's tenant based waiting list.

MTW flexibilities will be used in the administration of the Mainstream Voucher Program. Subsidies will be calculated according to the Path to the Success rent calculation. Rent reasonableness regulations, SDHC subsidy standard policies, and SDHC payment standards will be applied to the Mainstream Voucher program with applicable MTW flexibilities enacted.

All Mainstream Voucher participants will be recertified on a biennial basis.

HQS inspections are conducted on a biennial cycle.

SECTION 13: EMERGENCY HOUSING VOUCHER (EHV) PROGRAM

A. INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act (ARPA) of 2021 into law. The ARPA provided trillions in relief funds to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. Section 3202 of the ARPA appropriated \$5 billion for new incremental emergency housing vouchers (EHVs) and the renewal of the EHVs.

The EHVs are to assist individuals and families who are: experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; and recently homeless and for whom providing rental assistance will prevent the family's homelessness or having a high risk of housing instability.

Generally, the EHV program will be administered in accordance with regular housing choice voucher (HCV) program requirements (24 CFR Section 982). However, the Act allows the U.S. Department of Housing and Urban Development (HUD) to waive or specify alternative requirements for any provision of any statute or regulation that HUD administers in connection with this program in order to effectively



deliver and administer HUD-EHV voucher assistance. These flexibilities and policies governing the administration of the EHV program are included in this Chapter.

B. EMERGENCY HOUSING VOUCHER POLICY

1. Target Population

In order to be eligible for an EHV, an individual or family must meet one of four eligibility categories, as defined by HUD:

- Homeless
- At risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having a high risk of housing instability

2. Violence Against Women Act (VAWA)

SDHC may utilize an EHV to facilitate an emergency transfer in accordance with VAWA. If an EHV is available at the time a Section 8 HCV household is a victim and requests an emergency transfer, SDHC may issue an EHV instead of an HCV move voucher or project based voucher (PBV) unit transfer. The victim must follow the procedures outlined in SDHC's Emergency Transfer Plan including compliance with documentation requirements.

3. Referrals

SDHC will accept referrals for the EHV program from the local Continuum of Care (CoC), the Regional Task Force on Homelessness (RTFH), through the Coordinated Entry System (CES) and from other identified partnering organizations.

SDHC will execute a Memorandum of Understanding (MOU) with its partnering CoC, RTFH, to establish a collaboration for referrals and to delineate the roles and responsibilities of SDHC and the CoC, including, but not limited to, the CoC making direct referrals of families to SDHC through the CES.

HUD waived §982.204(a) which requires that, with the exception of special admissions, participants be selected from the PHA waiting list in accordance with the PHA's admissions policies. SDHC's HCV waiting list will not be utilized, and direct referrals for EHV's will not be added to SDHC's regular HCV waiting list.

4. Housing Placement Services



SDHC will not deny assistance to applicants who have been evicted from federally assisted housing, applicants adversely terminated by any public housing authority (PHA) or applicants who owe monies to any PHA.

SDHC will still deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information in accordance with 24 CFR part 5 as required by 982.552(b)(3).

ii. No Residence Preference

HUD is waiving § 982.207(b) and establishing an alternative requirement under which a PHA may not apply any residency preference to EHV applicants.

The emergency nature of the EHV, the fact that many individuals and families in the targeted populations may not necessarily qualify as a “resident” due to their housing circumstances, and the direct referral/coordinated entry aspect of EHV administration, HUD has determined it is not appropriate to apply residency preferences for EHV admission.

As such, SDHC will not require proof of residence within the City of San Diego at the time of referral/admission. However, at initial lease up, the voucher holder must lease a unit within SDHC’s jurisdiction unless they request to exercise portability. EHV will follow HCV port guidelines.

iii. Income Verification at Admissions

HUD waived the third-party income verification requirements for EHV applicants and is allowing PHAs to consider self-certification as the highest form of income verification at admission if other verification is unavailable.

At admission, SDHC will require income verification to determine eligibility. If verification of income is not available, SDHC may accept delayed receipt of documentation, third party verification, or, under extenuating circumstances, a self-certification in order to provide flexibility, mitigate barriers to housing, and avoid delaying the family’s assistance.

Once HUD makes Enterprise Income Verification (EIV) data available, the PHA will review the EIV Income and Income Validation Tool (IVT) Reports, maintain copies of the reports, and resolve any income discrepancy with the family within 60 days of the EIV Income or IVT Report dates.

iv. Use of Recently Conducted Initial Income Determinations and Verifications at Admission

SDHC will accept alternative income calculations and verifications from other subsidized housing programs within 180 days of intake in lieu of conducting an initial examination of income as long as the income was (1) calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months and (2) the family certifies there has been no change in income or family composition in the interim.

Examples of verifications from other subsidized housing programs include, but are not limited to (1) those for recently homeless families who are currently residing in rapid rehousing or are receiving other time-limited housing assistance and (2) for families eligible for EHV assistance as



SDHC will establish a separate payment standard for EHV. SDHC will utilize the current Choice Communities Veterans Affairs Supportive Housing (VASH) payment standard.

b) Rent Calculation

SDHC will utilize the traditional HCV rent calculation for EHV households.

c) Recertifications

SDHC will conduct a full recertification of household income, deductions, allowances, and family composition biennially.

d) Housing Quality Standards (HQS) Inspections

HQS inspections will be conducted on a biennial cycle.

7. Inapplicability of Project-Based Voucher Assistance

SDHC will not project-based EHV but will administer these vouchers exclusively as tenant-based vouchers.

8. Turnover EHV

SDHC will not issue turnover vouchers, and may not reissue an EHV when assistance for an assisted family ends, after September 30, 2023.

Currently, the funds appropriated for the EHV program are available for obligation by HUD until September 30, 2030 and will be cancelled as a matter of law on September 30, 2035. If funding is no longer available while there are families still utilizing the EHV, then SDHC will seek alternative housing resources, if funding is available, for remaining participants. SDHC will abide by HUD regulations for program termination requirements if funding is discontinued and alternative funding is not identified or available.

SECTION 14: HOMELESS DEFINITIONS

SDHC will use HUD's definition of Literally Homeless (Category1):

1) An individual or family who lacks a fixed, regular, and adequate nighttime residence; meaning:

a) Has a primary nighttime residence that is a public or private place not meant for human habitation;

b) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or



- c) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

“At Risk of Homelessness” means:

- 1) Households with incomes at or below the greater of 20% of State Median Income (SMI) or Area Median Income (AMI) with no rental subsidy available to the household; or
- 2) Households with incomes above 20% but not exceeding 30% of the greater SMI or AMI who:
 - a) Face immediate eviction and have been unable to identify a subsequent residence; or
 - b) Face imminent release from an institution (i.e.; jail, hospital or foster care system) where other housing placement resources are not available; or
 - c) Reside in an overcrowded setting (more than two persons per living/sleeping area) in which the household does not hold a lease; or
 - d) Reside in substandard housing subject to a current official vacation notice; or
 - e) Pay more than 50% of income in housing costs

Homeless applicants who meet the criteria described above must provide certification of homeless status from a public or private facility that provides shelter for such households, or from the local police department, or any social service agency that provides services for homeless people.

Applicants who are homeless due to residing in a transitional housing program must provide a letter from the transitional program’s sponsoring agency documenting the applicant’s participation and readiness to maintain an independent tenancy.

Note: At risk of homelessness served through authorized non-traditional Moving to Work Programs.

“Chronically Homeless” means:

- 1) A "homeless individual with a disability" as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act, who:
 - a) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - b) Has been homeless and living as described in paragraph (1)(a) of this definition continuously for at least 12 months or on at least four separate occasions in the last three years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least seven consecutive nights of not living as described in paragraph (1)(a). Stays in institutional care facilities for fewer than 90 days will not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;



2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or

3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

A literally Homeless Veteran is:

1) An individual or family who meets HUD's definition of literally homeless (Category 1) and

2) Is a person who has served in the active military service of the United States and who shall have been released under conditions other than dishonorable.



REASONABLE RENT A rent to owner that is not more than rent charged for comparable units in the private unassisted market, and not more than the rent charged for comparable unassisted units in the premises.

RECEIVING PHA In portability: An PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA issues a certificate or voucher and provides program assistance to the family.

RENT BURDEN (MTW SDHC) Rent burden occurs when a participating family pays more than 50% of total family income on rent. Under the Moving To Work program, participating families are allowed to pay up to 50% of their adjusted income toward their rent portion, with the exception of VASH program participants.

RENT TO OWNER The total monthly rent payable to the owner under the lease for the unit. Rent to owner covers payment for any housing services, maintenance and utilities that the owner is required to provide and pay for.

RESIDENCY PREFERENCE A PHA preference for admission of families that reside anywhere in a specified area, including families with a member who works or has been hired to work in the area (*"residency preference area"*).

RESIDENCY PREFERENCE AREA The specified area where families must reside to qualify for a residency preference.

RESIDENT ASSISTANT A person who lives in an Independent Group Residence and provides on a daily basis some or all of the necessary services to elderly, handicapped, and disabled individuals receiving Section 8 housing assistance and who is essential to these individuals' care or well-being. A Resident Assistant shall not be related by blood, marriage or operation of law to individuals receiving Section 8 assistance nor contribute to a portion of their income or resources towards the expenses of these individuals.

RESPONSIBLE ENTITY For the public housing and Section 8 tenant-based assistance and project-based voucher assistance, the responsible entity means the PHA administering the program under an ACC with HUD. For all other Section 8 programs, the responsible entity means the Section 8 owner.

SECRETARY The Secretary of Housing and Urban Development.

SECURITY DEPOSIT A dollar amount that can be applied to unpaid rent, damages or other amounts to the owner under the lease.

SERVICE PERSON A person in the active military of the United States.

SHORT TERM TRANSITIONAL PROGRAM Project Based Subsidies for the Homeless. It is a short-term, transitional housing program using flat-subsidy, project-based subsidy paired with supportive services, offered by a selected provider agency.

SINGLE PERSON A person living alone or intending to live alone who is not elderly or displaced or a person with a disability, or the remaining member of a tenant family.



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COVER

**This attachment contains: Homeless Preference and Moving on Preference Documents for the
largest PHAs in CA601 – San Diego City and County CoC
and City of Carlsbad, a formal partner with the CoC**

PHA CA063 San Diego Housing Commission

Administrative Policies

Rental Assistance

2024-25 Move to Work Annual Plan

Occupancy Policy

PHA CA108 Housing Authority of the County of San Diego

Administrative Policies

Limited Preference for CoC Referrals

PHA CA077 - Carlsbad Housing and Homeless Services

Preference Policies and Partnership Agreement

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1-I.D. THE PHA'S PROGRAMS

The following programs are included under this administrative plan:

HACSD Policy

The HACSD's administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition to the Housing Choice Voucher Rental Assistance Program, the HACSD operates the following housing assistance programs:

- Moderate Rehabilitation Program
- Emergency Housing Voucher (EHV) Program
- Mobile Home Demonstration Program
- Preservation/Enhanced Voucher Program
- Mainstream
- Bringing Families Home (BFH)
- Family Unification Program (FUP)
- Housing Opportunities for Persons with AIDS (HOPWA)
- HOME Tenant-Based Rental Assistance Programs
- Veterans Affairs Supportive Housing (VASH)

These programs are administered in conformance with Section 8 rules and regulations, unless indicated otherwise in the special program plans or the specific program regulations and guidelines published by HUD or other funding sources. The HACSD Administrative Plan policies and procedures constitute the policies and practices for these special housing assistance programs.

1-I.E. THE PHA'S COMMITMENT TO ETHICS AND SERVICE

As a public service agency, the PHA is committed to providing excellent service to HCV program participants, owners, and to the community. The PHA's standards include:

- Administer applicable federal and state laws and regulations to achieve high ratings in performance measurement indicators while maintaining efficiency in program operation to ensure fair and consistent treatment of clients served.
- Provide decent, safe, and sanitary housing, in compliance with program housing quality standards, for very low-income families while ensuring rents are fair, reasonable, and affordable.
- Encourage self-sufficiency of participant families and assist in the expansion of opportunities which address educational, socio-economic, recreational and other human services needs.
- Promote fair housing and the equal opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice.
- Promote a housing program which maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families.
- Promote a market-driven housing program that will help qualified low-income families be successful in obtaining affordable housing and increase the supply of housing choices.
- Create positive public awareness and expand the level of family, owner, and community support in accomplishing the PHA's mission.

PART II: THE HOUSING CHOICE VOUCHER (HCV) PROGRAM

1-II.A. OVERVIEW

The United States Housing Act of 1937 (the "Act") is responsible for the birth of federal housing program initiatives.

The Housing and Community Development Acts of 1974 and 1987 created the Section 8 tenant-based rental assistance programs, (Certificate and Voucher) operating as separate programs.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA) — also known as the Public Housing Reform Act — was signed into law. QHWRA eliminated all statutory differences between the former Certificate and Voucher tenant-based programs and required that the two programs be merged into a single tenant-based assistance program, now known as the Housing Choice Voucher (HCV) program.

The HCV program requires an assisted family to pay at least 30 percent of adjusted income for rent. Eligible families select housing in the private rental market. Eligible units must meet basic physical standard (housing quality standards) and rents must be within certain HUD-established rent limitations ("fair market rents").

1-II.B. HCV PROGRAM BASICS

The purpose of the HCV program is to provide rental assistance to eligible families. The rules and regulations of the HCV program are determined by the U.S. Department of Housing and Urban Development. HACSD is afforded choices in the operation of the program which are included in HACSD's administrative plan, a document approved by HACSD's Board of Commissioners.

The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the HACSD's jurisdiction and may also be eligible to move under portability to other PHAs' jurisdictions.

When a family is determined to be eligible for the program and funding is available, HACSD issues the family a housing voucher. When the family finds a suitable housing unit and funding is available, HACSD will enter into a contract with the owner and the family will enter into a lease with the owner. Each party makes their respective payment to the owner so that the owner receives full rent.

Even though the family is determined to be eligible for the program, the owner has the responsibility of approving the family as a suitable renter. HACSD will continue to make payments to the owner as long as the family is eligible, and the housing unit continues to qualify under the program.

Terminology

The Housing Authority of the County of San Diego is referred to as the "HACSD", "PHA" or "Housing Authority" throughout this document.

"Family" is used interchangeably with "Applicant" or "Participant" or "Tenant" or "Household" and can refer to a single person family.

"Tenant" is usually used to refer to participants in terms of their relation to landlords.

"Landlord" and "owner" are used interchangeably.

"Non-citizen Rule" refers to the regulation effective June 19, 1995, restricting assistance to U.S. citizens and eligible immigrants.

"HQS" means the Housing Quality Standards required by regulations as enhanced by the PHA.

"Failure to Provide" refers to all requirements of the Family Obligations of the program as outlined elsewhere in the Plan.

PART III: THE HCV ADMINISTRATIVE PLAN

1-III.A. OVERVIEW AND PURPOSE OF THE PLAN

The purpose of this Administrative Plan (Plan) is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives outlined in the PHA's agency plan. All pre-merger regular tenancy contracts, Housing Choice Voucher contracts and over fair market rent tenancy contracts have been transitioned to the Housing Choice Voucher Program as of October 1, 1999. This Plan is a supporting document to the PHA agency plan and is available for public review as required by CFR 24 Part 903.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the HUD programs it administers. If such changes conflict with this Plan, HUD regulations will have precedence. The PHA Board of Commissioners must approve the original Plan and any significant changes. The pertinent sections must be included in the agency plan with a copy provided to HUD.

Local rules incorporated in this Plan are intended to promote local housing objectives consistent with the intent of federal housing legislation.

HACSD Policy

Rules and Regulations [24 CFR 982.52]

This Plan defines the HACSD's local policies for operation of the housing programs in the context of federal laws and regulations. Generally, not fully addressed in this document are Section 8 issues governed by federal regulations, HUD memos, notices, guidelines, or other applicable law. If any issue is not found in this plan or in the resources named above, the HACSD may address the issue with a policy notice to HACSD staff and post on the HACSD website, unless the new policy is a significant program change as defined in the Agency Plan. The policies in this Plan have been designed to ensure compliance with the consolidated annual contributions contract (ACC) and all HUD-approved applications for program funding.

Temporary exceptions to the policies cited in this Plan may be authorized to mitigate jurisdiction-wide health and safety conditions or as directed or authorized by HUD. The HACSD may amend this Plan or may establish separate policy documents to comply with federal, state and local mandates.

1-III.B. CONTENTS OF THE PLAN [24 CFR 982.54]

The HUD regulations outline the policies that must be included in the administrative plan. The PHA's administrative plan must cover the PHA's policies as detailed in 24 CFR 982.54.

Mandatory vs. Discretionary Policy

HUD makes a distinction between:

- *Mandatory policies*: those driven by legislation, regulations, current handbooks, notices, and legal opinions,
- *Optional, non-binding guidance*: including guidebooks, notices that have expired and recommendations from individual HUD staff, and
- *Discretionary Policies*: those pertaining to matters for which HUD allows the PHA discretion to establish local policies.

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD establishes income limits for all areas of the country and publishes them annually in the *Federal Register*. They are based upon estimates of median family income with adjustments for family size. The income limits are used to determine eligibility for the program and for income targeting purposes as discussed in this section.

Definitions of the Income Limits [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed the federal poverty level or 30 percent of the median income for the area, whichever number is higher.

Area median income is determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 982.201]

Income limits are used for eligibility only at admission. Income eligibility is determined by comparing the annual income of an applicant to the applicable income limit for their family size. In order to be income eligible, an applicant family must be one of the following:

- A *very low-income* family
- A *low-income family* that has been "continuously assisted" under the 1937 Housing Act. A family is considered to be continuously assisted if the family is already receiving assistance under any 1937 Housing Act program at the time the family is admitted to the HCV program [24 CFR 982.4; 24 CFR 982.201(b)]

HACSD Policy

The HACSD will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list.

- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173
- A low-income or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract on eligible low-income housing as defined in 24 CFR 248.101

HUD permits the PHA to establish additional categories of low-income families that may be determined eligible. The additional categories must be consistent with the PHA plan and the consolidated plans for local governments within the PHA's jurisdiction.

HACSD Policy

The HACSD has not established any additional categories of eligible low-income families.

Using Income Limits for Targeting [24 CFR 982.201]

At least 75 percent of the families admitted to the PHA's program during a PHA fiscal year must be extremely low-income families. HUD may approve exceptions to this requirement if the PHA demonstrates that it has made all required efforts but has been unable to attract an adequate number of qualified extremely low-income families.

Families continuously assisted under the 1937 Housing Act and families living in eligible low-income housing that are displaced as a result of prepayment of a mortgage or voluntary termination of a mortgage insurance contract are not counted for income targeting purposes.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. Eligible immigrants are persons who are in one of the HUD-specified immigrant categories and must have their status verified by the U.S. Citizenship and Immigration Services (USCIS). At least one family member must be a citizen, national, or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance. For the citizenship/eligible immigration requirement, the status of each member of the family, except live-in aides and foster children, is considered individually before the family's status is defined. A live-in aide's legal residency will be confirmed through documents. The legal residency of foster children/adults will be verified with the placement agency.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, cohead, and any other family member 18 or older, and by a parent or guardian for minors. Each family member must declare their status once. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration as verification of their status. However, HUD regulations permit the PHA to request additional documentation of their status, such as a passport.

HACSD Policy

Family members who declare U.S. citizenship or national status will not be required to provide additional documentation unless the HACSD receives information indicating that an individual's declaration may not be accurate.

Eligible Noncitizens

Independent Student

HACSD Policy

The HACSD will consider a student “independent” from their parents and the parents’ income will not be considered when determining the student’s eligibility if the following four criteria are all met:

- The individual is of legal contract age under state law.
- The individual has established a household separate from their parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student.

To be considered an independent student according to the Department of Education, a student must meet one or more of the following criteria:

- The individual is at least 24 years old by December 31 of the award year for which aid is sought
- 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
- The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s state of legal residence
- The individual is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for other than training purposes
- The individual is a graduate or professional student
- The individual is married
- The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)
- The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:
 - A local educational agency homeless liaison
 - The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director
 - A financial aid administrator
- The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances
- The individual was not claimed as a dependent by their parents pursuant to IRS regulations, as demonstrated on the parents’ most recent tax forms.
- The individual provides a certification of the amount of financial assistance that will be provided by their parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

If the PHA determines that an individual meets the definition of a vulnerable youth such a determination is all that is necessary to determine that the person is an independent student for the purposes of using only the student’s income for determining eligibility for assistance.

The PHA will verify that a student meets the above criteria in accordance with the policies in Section 7-II.E.

Institution of Higher Education

The PHA will use the statutory definition under section 102 of the Higher Education Act of 1965 to determine whether a student is attending an institution of higher education (see Exhibit 3-2).

Parents

HACSD Policy

For purposes of student eligibility restrictions, the definition of parents includes biological or adoptive parents, stepparents (as long as they are currently married to the biological or adoptive parent), and guardians (e.g., grandparents, aunt/uncle, godparents, etc.).

Person with Disabilities

The PHA will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a person with disabilities (see Exhibit 3-1).

Veteran

HACSD Policy

A veteran is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Vulnerable Youth

HACSD Policy

A vulnerable youth is 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:

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

The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence

The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

A local educational agency homeless liaison

The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director

A financial aid administrator

Determining Student Eligibility

If a student is applying for assistance on their own, apart from their parents, the PHA must determine whether the student is subject to the eligibility restrictions contained in 24 CFR 5.612. If the student is subject to those restrictions, the PHA must ensure that: (1) the student is individually eligible for the program, (2) either the student is independent from their parents or the student's parents are income eligible for the program, and (3) the "family" with which the student is applying is collectively eligible for the program.

Covered person, for purposes of 24 CFR Part 982 and this chapter, means a tenant, any member of the tenant's household, a guest or another person under the tenant's control.

Drug means a controlled substance, as defined in section 102 of the Federal Controlled Substances Act (21 U.S.C. 802), and its illegal use, as defined under federal guidelines, is prohibited. This includes medical and recreational marijuana.

Drug-related criminal activity means the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug (includes medical and recreational marijuana).

Guest, for purposes of this chapter and 24 CFR part 5, subpart A and 24 CFR Part 982, means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

Household, for the purposes of 24 CFR Part 982 and this chapter, means the assisted family and PHA-approved live-in aide and foster children.

Other person under the tenant's control, for the purposes of the definition of covered person and for 24 CFR Parts 5 and 982 and for this chapter, means that the person, although not staying as a guest (as defined in this chapter) in the unit, is or was at the time of the activity in question on the premises because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not under the tenant's control.

Violent criminal activity means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

Other Criminal Activity is activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises, etc.

Engaged in or engaging in criminal activity is a criminal act as defined in this Plan by an applicant or participant or household member, which may or may not have resulted in the arrest and/or conviction of the applicant, participant, or household member.

HACSD Policy

Eligibility for Admission

To be eligible for participation, an applicant must meet HUD's criteria, as well as any permissible additional eligibility criteria established by the HACSD to prevent future criminal activity, as well as other patterns of behavior that pose a threat to the health, safety or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity of the premises. As required by 24 CFR 982, Subpart L, and CFR Part 5, Subpart J, the HACSD will screen applicants as thoroughly and fairly as possible for current illegal drug-related activities (including use of medical and recreational marijuana), current alcohol abuse activities, sex-offender registration requirements, violent criminal behavior, and other activities that may negatively impact others.

Such screening will apply to any member of the household who is 18 years of age or older; however, evidence of prohibited criminal activities conducted by minors in the household will also be cause for denial of assistance.

Admission to the program is never based on [982.202(b)]:

Where a family lives prior to admission to the program

Where the family will live with assistance under the program

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

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

The PHA's HCV waiting list is organized in such a manner to allow the PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

HACSD Policy

The HACSD, at the time of preliminary application, will collect the following information necessary for proper selection from the waiting list:

- Applicant name;
- Applicant Address
- Date and time of application;
- Qualification for any local preference;
- Gross annual income;
- Disabled or Elderly household;
- Racial or ethnic designation of the head of household;
- Other targeted program qualifications.

HUD permits, but does not require, PHAs to maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs. A family's decision to apply for, receive, or use other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

The HACSD uses a single waiting list for admission to its Section 8 tenant-based assistance program. The HACSD will not merge its waiting lists [24 CFR 982.205]. However, if the Section 8 waiting list is open when the applicant is placed on the Public Housing Program, another project-based voucher program or the Moderate Rehabilitation Program waiting lists, the HACSD must offer to place the family on the tenant-based assistance list.

Moderate Rehabilitation Program applicants may be taken from the Section 8 waiting list. Mainstream Program applicants are taken from the Section 8 waiting list.

A family who lives in the jurisdiction of another cooperative housing authority, named below, will be advised of the benefit of being placed on the appropriate housing authority's waiting list, and the information will be forwarded to the appropriate cooperative housing authority upon verbal permission of the family.

Cooperative Agreement

a Spanish language general circulation publication, and an English language general circulation publication.

The notice will contain:

- The dates, times, and the locations where families may apply
- The programs for which applications will be taken
- A brief description of the program
- A statement that public housing residents must submit a separate application if they want to apply for Section 8
- Limitations, if any, on who may apply
- HACSD address
- HACSD telephone number
- Location/information on submitting applications

Local Preferences

The notices will be provided in an accessible form. The HACSD also may issue news releases to radio and/or television stations and provide presentations to organizations that provide assistance to special population groups, such as the elderly, or persons with disabilities.

Upon request from a person with a disability, additional time will be given as a reasonable accommodation for submission of an application after the closing deadline, if there is a closing deadline. This reasonable accommodation is to allow persons with disabilities the greatest possible opportunity to submit an application.

4-II.D. FAMILY OUTREACH [HCV GB]

The PHA must conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires the PHA to admit a specified percentage of extremely low-income families to the program (see Chapter 4, Part III), the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB].

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low-income

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The PHA will maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

HACSD Policy

Applicants will not be pulled from the waiting list for eligibility processing unless funding is available. Once funding is available, applicants will be pulled by preference group and income targeting guidelines and in proper order, as determined by their date and time of placement on the waiting list. The method of selection from the waiting list will be clearly documented [24 CFR 982.207(e)].

Special Admissions [24 CFR 982.203]

HACSD Policy

The HACSD may admit up to 10 percent of its annual admissions as special admissions [24 CFR 982.54(d)(3), 982.203]. However, these special admissions must be funded by special HUD-targeted funding. Examples of this special funding follow:

- A family displaced because of demolition or disposition of a public housing project
- A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project
- For housing covered under the Low-Income Housing Preservation and Resident Homeownership Act of 1990 (41 U.S.C. 4101, et seq.)
- A non-purchasing family residing in a project subject to a homeownership program (under 24 CFR 248.173)
- A family displaced because of mortgage prepayment or voluntary termination of a mortgage insurance contract (as provided in 24 CFR 248.165)
- A family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term
- A non-purchasing family residing in a HOPE 1 or HOPE 2 project

Targeted Funding [24 CFR 982.204(e)]

HUD may award a funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

HACSD Policy

Participants admitted under targeted funding provisions must meet applicable verification and eligibility requirements. The HACSD administers the following types of targeted funding:

Mainstream: Mainstream vouchers are awarded to non-elderly disabled families on the HCV waiting list. HACSD applies local preferences in determining the order in which Mainstream vouchers are awarded to eligible families.

Veterans Affairs Supportive Housing (VASH): HUD allocated funding to provide Housing Choice Voucher (HCV) tenant-based rental assistance for qualifying homeless veterans referred by the Department of Veterans Affairs.

Family Unification Program (FUP): FUP vouchers serve Child Welfare involved families and youth who lack adequate housing. Vouchers are administered in partnership with HHSA Child Welfare Services (CWS).

Emergency Housing Voucher Program (EHV): EHV vouchers serve individuals and families referred by the Regional Taskforce on Homelessness (RTFH) who are experiencing or at risk of experiencing homelessness and meet specific prioritization criteria. A separate waitlist serves the EHV program.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

This section describes 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 GB]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion.

HACSD Policy

HACSD has established local preferences that are consistent with the HACSD Plan.

When determining equally ranked preferences, the date and time of application is the final deciding factor.

Super Preference

Families in good standing participating in the HACSD's Housing Choice Voucher program who have been terminated due to insufficient funding have a super preference to the categories listed below and have first priority for selection from the Housing Choice Voucher program waiting list when the HACSD resumes issuing vouchers to applicants according to the policies in Chapter 12-I.E. of the Plan.

Special Local Preferences

The HACSD has established special local preferences for six groups:

(1) HACSD Public Housing residents referred by the Public Housing administrator who must move due to being the victims of domestic violence, dating violence, sexual assault, or stalking; or is seeking an emergency transfer under VAWA from the PHA's public housing program;

(2) HACSD Public Housing residents referred by the Public Housing Administrator who must move out of their units for a significant period of time, as determined by the Public Housing Administrator, in order for repairs to be made to their HACSD Public Housing units;

(3) HACSD Public Housing residents who are eligible for a reasonable accommodation and for whom a right sized unit is unavailable for more than 90 days;

(4) Eligible homeless applicants who have been referred by the Regional Taskforce on Homelessness agency members, and either:

- a) Meet the definition of homelessness and referral criteria, as determined by HACSD/HCDSD programs, or;
- b) Are exiting federally-assisted, locally-assisted, or state-assisted HACSD/HCDSD administered housing programs with no other permanent housing placement options;

(5) Eligible non-elderly disabled applicants who, (a) have been referred by the County of San Diego, Health and Human Services Agency, and (b) who are homeless or who are exiting an institution or segregated setting as defined in Chapter 18-I.

(6) Eligible households referred by County of San Diego partners in the below categories:

- a) Approximately 20 referrals from the Public Safety Group for persons fleeing domestic violence or sex trafficking within the San Diego region
- b) Approximately 60 referrals from Health and Human Services Agency, Aging and Independence Services in collaboration with the Office of Homeless Solutions for elderly families (Head, spouse, or co-head is at least 62 years of age) who are experiencing housing insecurity as determined by the referring partner

The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed. ***Note:** Special local preference group (4) will have a maximum of 1000 vouchers available to those who meet the criteria. Special local preference group (5) will have a maximum number of 138 vouchers available to those who meet the criteria. Special local preference group (6) will have a maximum number of 80 vouchers available for those who meet the criteria. HACSD has the discretion to redistribute vouchers between referral partners.

* These selection preferences are rated higher than the following ranking preferences.

Residency Preference [24 CFR 982.207(b)]

- A family who, at the time of selection, lives or includes a member who works or has been notified that they are hired to work in the HACSD jurisdiction regardless of length of time, and are in one of the local preference categories listed below.

Use of the residency preference will not have the effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family. Prioritization will be established in combination with the local preferences indicated below.

Category One

The HACSD uses equally weighted local preferences for applicants, with priorities for those *who meet the residency preference in the HACSD jurisdiction* at the time of selection and are in one or more of the following categories:

- Families with dependent children
- Working Families:
 - The Head of household, spouse or sole household member is employed (must have worked an average of at least 20 hours per week for the previous 6 months. Applicants may combine job training or employment preparatory

academic program participation as part of the previous 6-month requirement, or

- The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits at the time of selection, or
- The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207 (b)(2)].
- Elderly families: The Head of household or spouse is 62 years of age or older.
- Disabled families: At least one household member is disabled.
- Veterans or surviving spouses of veterans: A veteran with a dishonorable discharge does not qualify for this preference.
- Homeless: "homeless individual," "homeless person," or "homeless family" per HUD's Definition of Homeless for the Continuum of Care (CoC) Program (previously Shelter Plus Care)

Category Two

Applicants who, at the time of selection, meet the residency preference in the HACSD jurisdiction, but who do not fit into Category One.

Category Three

Applicants who do not live or work within the HACSD jurisdiction, but are one or more of the following:

- Families with dependent children
- Working Families:
 - The Head of household, spouse or sole household member is employed at the time of selection (must have worked an average of at least 20 hours per week for the previous 6 months). Applicants may combine job training or employment preparatory academic program participation as part of the previous 6-month requirement, or
 - The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits, or
 - The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207 (b)(2)].
- Elderly families: The Head of household or spouse is 62 years of age or older.
- Disabled families At least one household member is disabled.
- Veterans or surviving spouses of veterans: A veteran with a dishonorable discharge does not qualify for this preference.
- Homeless: "homeless individual," "homeless person," or "homeless family" per HUD's Definition of Homeless for the Continuum of Care (CoC) Program (previously Shelter Plus Care)

Category Four

All other applicants not listed above.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at

or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low-income families admitted to the program that are “continuously assisted” under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

HACSD Policy

The HACSD will reserve a minimum of 75 percent of its Section 8 new admissions for families whose income does not exceed 30 percent of the area median income (AMI) or the federal poverty level. The HACSD will admit families who meet the HACSD preferences and who qualify under the extremely low-income limit to meet the income-targeting requirement. The HACSD’s income-targeting requirement does not apply to low-income families continuously assisted, as provided for under the U.S Housing Act of 1937. The HACSD is also exempted from this requirement when aiding low-income or moderate-income families entitled to preservation assistance under the tenant-based program as a result of a mortgage prepayment or opt-out. The HACSD may, at least annually, exercise the “fungibility” provision of the QHWRA. This provision allows the HACSD to admit less than the required minimum 40 percent of extremely low-income families in a fiscal year to its public housing program if the admission of extremely low-income families in the tenant-based assistance program exceeds seventy-five percent (75%) of all admissions during the fiscal year. Upon exercising this option, the HACSD will follow the fungibility threshold limitations as set forth in QHWRA legislation. The HACSD-determined fungibility procedures are reflected in its Public Housing Admissions and Continued Occupancy Policy.

Order of Selection

The PHA system of preferences may select families based on local preferences according to the date and time of application or by a random selection process (lottery) [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the waiting list, it is not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

HACSD Policy

The HACSD will select families according to date and time of application within preference groups. The HACSD will skip over families to select families that meet specific criteria if it receives targeted funding for those specific families. The HACSD cannot select families for admission to the program in an order different from the order on the waiting list for the purpose of selecting lower-cost families for admission to the program.

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify and in accordance with the HACSD’s hierarchy of preferences. Within each targeted funding or preference category, families will be selected according to the date and time their waiting list application is received.

Eligibility processing for a family selected from the waiting list is based on the information provided on the eligibility declaration, the supporting documents submitted and independent verification by the HACSD. The family must be eligible for the preferences it has claimed, income limits and targeting, and jurisdiction priority as of the date it was pulled from the waiting list.

A family change in circumstances after the date the family was selected from the waiting list for eligibility processing will not be evaluated for a possible change in preference status, jurisdiction, income limits and targeting, unless the family change in circumstances prior to voucher issuance results in the family's income exceeding 50% of area median income (AMI), in which case the family must be denied program admission.

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months, in accordance with the HACSD's interim policy, unless the additions are due to birth, adoption, marriage or registered domestic partnership, court-awarded custody, return of minor or disabled children, or elderly or disabled dependents to the household.

Requests for removal of household members from the application may be considered at the discretion of the Housing Authority prior to confirmation of preference and determination of eligibility. The following scenarios are handled as follows:

Scenario Number One

A family met admission preferences and income targeting requirements as of the point of time of being selected from the waiting list, but during the full application process, the family moved outside of the HACSD's jurisdiction. The family may continue to be processed for admission.

Scenario Number Two

A family was over 50% AMI at the time it was selected from the waiting list, but then the income was reduced because of termination of employment. The family must be denied as being over income at the time it was pulled off the waiting list and must reapply.

Scenario Number Three

A family was at or below 30% AMI at the time it was selected from the waiting list. Then its income increased to over 30% of AMI, but at or below 50% of AMI, prior to completion of the full application and issuance of the voucher. The family met the income targeting requirements when it was pulled off the waiting list and is still income-eligible at completion of the full application and issuance of the voucher, so the family may be processed for admission.

Scenario Number Four

The family was income-eligible at the time it was selected from the waiting list but started working prior to the completion of the full application, which resulted in the family's income exceeding 50% of the AMI. The family must be denied as over-income and future changes in the family's circumstances cannot be considered; e.g., the family member quits their job. The family must reapply to the waiting list.

Scenario Number Five

The family's income increases after it was issued a voucher. The income increase will be handled in accordance with the HACSD's current interim policy.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family [24 CFR 982.554(a)].

HACSD Policy

The HACSD will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview.

Preference Review

All preferences claimed on the pre-application, or while the family is on the waiting list, will be verified after selection from the waiting list.

The family's preference will be determined at the time the full application is completed, but the family must meet the preference at the date of selection from the waiting list as preference determines the family's placement on the waiting list.

After a family is selected from the waiting list, applicants will be required to complete a full application and provide all requested documentation and information. The full application will be mailed to the applicant. The applicant must complete the full application.

Pre-Screening

Applicants pulled from the waiting list may be mailed a pre-screening application for the purpose of obtaining the applicant's self-certification of eligibility. The pre-screening application serves as a preliminary evaluation of the eligibility of waiting list applications. In addition to the pre-screening application, the applicant may be asked to provide supporting documents, such as pay stubs and bank statements.

If the pre-screening application indicates the applicant is eligible, the applicant will then be issued a full-eligibility application. The full application includes Form HUD-90026, Supplement to Application for Federally Assisted Housing. In evaluating the pre-screening applications, the HACSD generally will determine income eligibility based on the higher annual income calculated, although the HACSD will review the information in its entirety to make its determination. Those denied based on the pre-screening application will be offered the opportunity to request an informal review.

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months in accordance with the HACSD's interim recertification policy, unless the additions are due to birth, adoption, marriage or registered domestic partnership, court-awarded custody, return of minor or disabled children to the household, or elderly or disabled dependents.

If the family requests its name be returned to the waiting list at its former date and time of application prior to the completion of the eligibility process, the family may be returned to the waiting list as inactive unless it has been determined the family is ineligible.

Otherwise eligible applicants pulled from the waiting list and found not to meet preference or income-targeting requirements will be returned to the waiting list at original date/time of application.

Families whose annual income exceeds the income limit will be denied admission, removed from the waiting list, and offered an informal review.

Denials

Families determined to be ineligible will be notified in writing of the reason for denial, and given an opportunity to request an informal review or an informal hearing for a family denied because the family has no legal residents.

If the HACSD denies the applicant a preference [24 CFR 982.207] or for not meeting income targeting, it will notify the applicant in writing, indicating why and advising him/her of the opportunity to request an informal review with a departmental representative. If the preference or income targeting denial is upheld as a result of the review or the applicant does not request

- "Preference" status
- Marital status when needed for head or spouse definition and to add a spouse to the household
- Verification of reduction in benefits for noncompliance in certain programs, such as GAIN/WTW sanctions of CalWORKs benefits
- Verification from the welfare agency stating that the family's benefits have been reduced for fraud or noncompliance for determination of imputed income
- Verification of participation in a federal, state or local training program that is generating income
- Verification of being the victim of domestic violence, dating violence, or stalking
- Verification of foster adults/children from the placement agency

7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

HUD's Verification Hierarchy [Notice PIH 2018-18]

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

In order of priority, the forms of verification that the PHA will use are:

- Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Up-front Income Verification (UIV) using a non-HUD system
- Written Third-Party Verification (may be provided by applicant or participant)
- Written Third-party Verification Form
- Oral Third-party Verification
- Tenant Certification/Self-declaration

HACSD Policy

The HACSD will allow 10 days for the return of written third-party verification form before going to the next method, which is oral verification. The HACSD will document the file as to why Up-Front Income Verifications or third-party written verifications were not used.

Each of the verification methods is discussed in subsequent sections below.

Requirements for Acceptable Documents

HACSD Policy

For verification of those subject to the Violence Against Women Act, the certification must be received 14 working days from applicant's/participant's receipt of the HACSD request.

For applicants, verifications may not be more than 60 days old at the time of voucher issuance. For participants, verifications are valid for 120 days from date of receipt.

The family may be required to certify that they do not have a particular type of income or benefit, or asset. If this is required, the self-certification must be made in a format acceptable to HACSD and must be signed by the family member who information or status is being verified.

A birth certificate is not an acceptable verification of eligible immigration status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept five years.

PHA Verification [HCV GB]

HACSD Policy

Non-citizens with eligible immigration status must sign a declaration of status and verification consent form, with the exception of live-in aides and foster children/adults, and all household members including live-in aides, must provide original immigration documents. Front and back copies are retained and the original immigration documents are returned to the family. The HACSD verifies the eligible immigration status through the USCIS SAVE system. If the initial search fails to verify status, the HACSD will request, within 10 days, that the USCIS conduct a second manual search. If the documents have an expiration date, the applicants/participants must provide either a current document or an USCIS screen print of their current status.

A live-in aide's legal residency will be confirmed through documents. The legal residency of foster children/adults will be verified with the placement agency.

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

Failure to Provide

If an applicant or participant family member fails to sign required declarations and consent forms and/or provide current documents or an USCIS status screen print, as required, s/he must be listed as an ineligible member. If the entire family fails to provide and sign documents as required, the family may be denied or terminated for failure to provide required information. A live-in aide will be prohibited admission to the household to serve as a live-in aide if the live-in aide fails to provide documentation of legal residency.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined placement on the waiting list. [24 CFR 982.207]

HACSD Policy

The following preferences are applicable at the time of selection from the Waitlist.

Residency Preference: This preference applies to families who live, or includes a member who works or has been notified they have been hired to work in the HACSD jurisdiction regardless of length of time.

Acceptable documentation includes two or more of the following documents that indicate the current reported resident or employment address:

Rent receipts, leases, utility bills, employer or agency records, school records, driver's licenses, voter's registration records, credit reports, bank statements, benefits award letter, or statement from household with whom the family is residing. If homeless, a lesser standard of documentation is acceptable.

Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Families with Dependent Children Preference: To be eligible for this preference, the family must provide documentation that there are dependent children in the household or dependent children will be in the household once assistance is approved. A pregnant single person is no different than any other single applicant and is not considered a family with dependent children for admission preference purposes.

In most instances, self-certification is acceptable, unless there is reasonable doubt, in which case the HACSD will ask for further documentation of the placement of the children. This documentation of residence of the children may include:

School records, Court custody documents, leases, welfare agency information, and medical records.

Veterans Preference: This preference is available to active members of the U.S. Armed Forces, veterans (a veteran with a dishonorable discharge does not qualify for this preference), or surviving spouses of veterans.

The HACSD will require U.S. government documents that indicate that the applicant qualifies under the above definition.

Working Preference: This preference is available to families with:

- The Head of household, spouse or sole household member is employed at the time of selection (must have worked an average of at least 20 hours per week for the previous 6 months). Applicants may combine job training and employment preparatory academic program participation as part of the previous 6-month requirement.
- The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits.
- The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207(b)(2)].

Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Disability Preference: This preference is available to families with a head of household or spouse who is a person with disabilities, as defined by HUD.

The HACSD will request appropriate documentation from a knowledgeable health professional. The HACSD will not inquire as to the nature of the disability but will ask a knowledgeable health professional to confirm that the person meets the HUD definition of disability.

Other acceptable documentation of disability is either an award letter, or proof of eligibility for social security disability or supplemental security income.

The HACSD may accept as a reasonable accommodation other credible evidence that the person meets the disability definition.

Elderly Preference: This preference is available to families with a head of household or spouse who is 62 years of age or older.

The HACSD will require appropriate proof of age as verified by submittal of one or more of the following documents: birth certificate, passport, driver's license or resident alien card.

Homeless Preference: The documentation requirement is less stringent for homeless households, given the absence of a permanent residence. A notarized self-certification is required if the homeless household cannot provide documentation of employment/ residence in

the jurisdiction of the HACSD. In addition to the notarized self-certification, documentation must be provided to demonstrate residence in the jurisdiction of the HACSD around the time of selection from the waiting list.

Acceptable documentation includes the following: driver's license, automobile registration, documentation from a San Diego County benefit provider, or receipts from stores, restaurants, motels, etc.

Special Local Preference for Homeless Applicants, Regional Taskforce on the Homeless agency members: The documentation is significantly more stringent for homeless households claiming a special local preference. In addition to the applicable documents listed above, documentation must include:

PHA-approved referral documentation.

Special Local Preference for Non-Elderly Disabled Applicants who are homeless or exiting institutions-HHSA involved: The documentation for non-elderly disabled households claiming this special local preference is detailed in Chapter 18-I. Documentation for exiting an institution includes a certification from a medical provider. Documentation of homeless status is as listed above. In addition, documentation for each preference must include:

PHA approved referral documentation

Special Local Preference for Victims of Domestic Violence in the HACSD's Public Housing:

Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from the HACSD's waiting list because a family member has been determined to be the victim of domestic violence.

Special Local Preference for Families that must be Relocated from the HACSD's Public Housing Unit:

Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from the HACSD's waiting list because the family must be relocated for a significant period of time.

Chapter 10 - MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY

INTRODUCTION

Freedom of housing choice is a hallmark of the housing choice voucher (HCV) program. In general, HUD regulations impose few restrictions on where families may live or move with HCV assistance. This chapter sets forth HUD regulations and PHA policies governing moves within or outside the PHA's jurisdiction in two parts:

Part I: Moving with Continued Assistance. This part covers the general rules that apply to all moves by a family assisted under the PHA's HCV program, whether the family moves to another unit within the PHA's jurisdiction or to a unit outside the PHA's jurisdiction under portability.

Part II: Portability. This part covers the special rules that apply to moves by a family under portability, whether the family moves out of or into the PHA's jurisdiction. This part also covers the special responsibilities that the PHA has under portability regulations and procedures.

PART I: MOVING WITH CONTINUED ASSISTANCE

10-I.A. ALLOWABLE MOVES

HUD lists six regulatory conditions under which an assisted family is allowed to move to a new unit with continued assistance. Permission to move is subject to the restrictions set forth in section 10-I.B.

- The family has a right to terminate the lease on notice to the owner (for the owner's breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.354(b)(3)]. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the notice at the same time [24 CFR 982.354(d)(1)].
- The lease for the family's unit has been terminated by mutual agreement of the owner and the family [24 CFR 982.354(b)(1)(ii)].

HACSD Policy

If the family and the owner mutually agree to terminate the lease for the family's unit, the family must give the PHA a copy of the termination agreement.

- The owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family [24 CFR 982.354(b)(2)]. The family must give the PHA a copy of any owner eviction notice [24 CFR 982.551(g)].
- The family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health or safety of the family or family member [24 CFR 982.354(b)(4)]. This condition applies even when the family has moved out of its unit in violation of the lease, with or without prior notification to the PHA, if the family or family member who is the victim reasonably believed that they were imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.354(b)(4), 24 CFR 982.353(b)]. The PHA must adopt an emergency transfer plan as required by regulations at 24 CFR 5.2007(e).

HACSD Policy

If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the HACSD based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the HACSD will request that the resident request the emergency transfer using form HUD-5383, and the HACSD will request documentation in accordance with section 16-IX.D of this plan.

HACSD reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.

HACSD may choose to provide a voucher to facilitate an emergency transfer of the victim without first terminating the assistance of the perpetrator.

Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.

Unless the HACSD determines extenuating circumstances, assistance on the old and new units may not overlap. The HACSD may not make any housing assistance payment to the owner for any month **after** the month the family moves out. The owner may keep the housing assistance payment for the month when the family moves out of the unit.

If a participant family moves from an assisted unit with continued tenant-based assistance, the term of the assisted lease for the new assisted unit may begin during the month the family moves out of the first assisted unit. Overlap of the last housing assistance payment (for the month when the family moves out of the old unit) and the first assistance payment for the new unit, is not considered to constitute a duplicative housing subsidy.

A move within the same building or project, or between buildings owned by the same owner, will be processed like any other move and there will be no overlapping assistance.

Zero HAP Families Who Wish to Move [24 CFR 982.455]

A participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family.

HACSD Policy

Participants in zero HAP status will remain on the program for 180 days and eligible for reinstatement of benefits if their circumstances change within the 180 days. After 180 days, if the family continues to be ineligible for benefits the family will be dropped from the program.

The family may be transferred to another unit if it is determined the family will be eligible for assistance at another unit, but the family must lease-up within the initial voucher term.

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.

PART II: PORTABILITY

10-II.A. OVERVIEW

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another PHA is known as portability. The PHA that issues the voucher is called the **initial PHA**. The PHA that has jurisdiction in the area to which the family wants to move is called the receiving PHA.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA provides all housing services for the family and bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance with its own program funds, and the initial PHA has no further relationship with the family. The initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the initial PHA's voucher. Based on the receiving PHA's response, the initial PHA must determine whether they will approve or deny the portability request [Notice PIH 2016-09].

PHAs commonly act as both the initial and receiving PHA because families may move into or out of their jurisdiction under portability. Each role involves different responsibilities. The PHA will follow the rules and policies in section 10-II.B when it is acting as the initial PHA for a family. It will follow the rules and policies in section 10-II.C when it is acting as the receiving PHA for a family.

In administering portability, the initial PHA and the receiving PHA must comply with financial procedures required by HUD, including the use of HUD-required forms [24 CFR 982.355(e)(5)].

PHAs must also comply with billing and payment deadlines. HUD may reduce an administrative fee to an initial or receiving PHA if the PHA does not comply with HUD portability requirements [24 CFR 982.355(e)(7)].

10-II.B. INITIAL PHA ROLE

Allowable Moves under Portability

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. When a family provides a written request to move outside of the PHA's jurisdiction, the request must specify the area to which the family want to move. If there is more than one PHA in the area, the initial PHA provides the family with the contact information for the receiving PHAs that serve the area, and the family selects the receiving PHA. The family must inform the initial PHA which receiving PHA it has selected. If the family prefers not to select the receiving PHA, the initial PHA will select the receiving PHA on behalf of the family [24 CFR 982.255(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside the PHA's jurisdiction under portability. HUD regulations and PHA policy determine whether a family qualifies.

Applicant Families

Under HUD regulations, most applicant families qualify to lease a unit outside the PHA's jurisdiction under portability. However, HUD gives the PHA discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance. If a PHA intends to deny a family permission to move under portability due to insufficient funding, the PHA must notify HUD within 10 business days of the determination to deny the move [24 CFR 982.355(e)].

HACSD Policy

The HACSD may, if warranted by funding constraints and if permitted under regulations, deny a family's portability to a higher cost area.

HACSD will follow the policies established in section 10-I.B of this chapter.

In addition, the initial PHA may establish a policy denying the right to portability to nonresident applicants during the first 12 months after they are admitted to the program [24 CFR 982.353(c)].

HACSD Policy

If neither the head nor spouse had a domicile (legal residence) in the HACSD's jurisdiction at the date of initial application for assistance, the family may not be permitted to exercise portability upon initial issuance of a voucher unless the HACSD approves the move.

The HACSD will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2) or reasons related to domestic violence, dating violence, sexual assault, or stalking.

Participant Families

The initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. The Violence against Women Act of 2013 (VAWA) creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of a family member who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking and who reasonably believed they were imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.353(b)].

HACSD Policy

The HACSD will determine whether a participant family may move out of the HACSD's jurisdiction with continued assistance in accordance with the regulations and policies set forth here and in sections 10-I.A and 10-I.B of this chapter.

The HACSD will not permit families to exercise portability if:

- The family owes money to the HACSD, or if the family is delinquent on repayment of monies owed to any other PHA;
- The family is ineligible to move as outlines elsewhere in this chapter; or
- The family is being investigated for possible ineligibility for the program.

The PHA will notify the family of its determination in accordance with the approval policy set forth in section 10-I.C of this chapter.

A family cannot extend its move-out notice if a portability packet has been issued to the receiving PHA.

Determining Income Eligibility

Applicant Families

An applicant family may lease a unit in a particular area under portability only if the family is income eligible for admission to the voucher program in that area [24 CFR 982.353(d)(1)]. The family must specify the area to which the family wishes to move [24 CFR 982.355(c)(1)].

The initial PHA is responsible for determining whether the family is income eligible in the area to which the family wishes to move [24 CFR 982.353(d)(1), 24 CFR 982.355(9)]. If the applicant family is not income eligible in that area, the PHA must inform the family that it may not move there and receive voucher assistance [Notice PIH 2016-09].

Participant Families

The income eligibility of a participant family is not redetermined if the family moves to a new jurisdiction under portability [24 CFR 982.353(d)(2)].

Reexamination of Family Income and Composition

No new reexamination of family income and composition is required for an applicant family.

HACSD Policy

HACSD will not require a new reexamination of family income and composition for the applicant or participant family. The HACSD will make any exceptions to this policy necessary to remain in compliance with HUD regulations.

Briefing

The regulations and policies on briefings set forth in Chapter 5 of this plan require the PHA to provide information on portability to all applicant families that qualify to lease a unit outside the PHA's jurisdiction under the portability procedures. Therefore, no special briefing is required for these families.

HACSD Policy

No formal briefing will be required for a participant family wishing to move outside the PHA's jurisdiction under portability. However, the HACSD will provide the family with the same oral and written explanation of portability that it provides to applicant families selected for admission to the program (see Chapter 5).

The HACSD will provide the name, address, and phone of the contact for the PHAs in the jurisdiction to which they wish to move.

The HACSD will advise the family that they will be under the receiving PHA's policies and procedures, including screening, subsidy standards, voucher extension policies, and payment standards.

Voucher Issuance and Term

An applicant family has no right to portability until after the family has been issued a voucher [24 CFR 982.353(b)]. In issuing vouchers to applicant families, the PHA will follow the regulations and procedures set forth in Chapter 5.

HACSD Policy

For participating families approved to move under portability, the PHA will issue a new voucher within 10 days of receipt of all required documentation. The initial term of the voucher will be a minimum of 60 calendar days.

Voucher Extensions

HACSD Policy

The HACSD will only approve extensions to a voucher issued to an applicant or participant family porting out of the HACSD's jurisdiction under the following circumstances: (a) the initial term of the voucher will expire before the portable family will be issued a voucher by the receiving PHA, (b) the family decides to return to the initial PHA's jurisdiction and search for a unit there, or (c) the family decides to search for a unit in a third PHA's jurisdiction.

In such cases, the policies on voucher extensions set forth in Chapter 5, section 5-II.E, of this plan will apply, including the requirement that the family apply for an extension in writing prior to the expiration of the initial voucher term.

Voucher Expiration

To receive or continue receiving assistance under the initial PHA's voucher program, a family that moves to another PHA's jurisdiction under portability must be under HAP contract in the receiving PHA's jurisdiction within 90 days following the expiration date of the initial PHA's voucher term (including any extensions). (See below under "Initial Billing Deadline" for one exception to this policy).

Portability Move-Out Date

Once the HACSD (initial PHA) sends the family's portability paperwork to the receiving PHA, the HACSD is no longer administering that family's voucher. The HACSD cannot provide assistance for the family beyond their intended move-out date. If the family requests an extension of their assistance at their current unit beyond their intended move-out date, the portability request will be considered canceled by HACSD. The receiving PHA must return the portability paperwork to the HACSD to reinstate the family's assistance. If the family then chooses to port, they must once again submit a written request to initiate the portability process.

Preapproval Contact with the Receiving PHA

Prior to approving a family's request to move under portability, the initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the family's voucher. Based on the receiving PHA's response, the initial PHA must determine whether it will approve or deny the move [24 CFR 982.355(c)(3)].

HACSD Policy

The HACSD will contact the receiving PHA by mail, telephone, fax or e-mail.

Initial Notification to the Receiving PHA

After approving a family's request to move under portability, the initial PHA must promptly notify the receiving PHA via email or other confirmed delivery method to expect the family [24 CFR 982.355(c)(3); 24 CFR 982.355(c)(7)]. The initial PHA must also advise the family how to contact and request assistance from the receiving PHA [24 CFR 982.355(c)(6)].

HACSD Policy

Because the portability process is time-sensitive, the HACSD will notify the receiving PHA by phone, fax, or email to expect the family. The HACSD will provide the contact information for the receiving PHA to the family.

Sending Documentation to the Receiving PHA

The initial PHA is required to send the receiving PHA the following documents:

- Form HUD-52665, Family Portability Information, with Part I filled out [Notice PIH 2016-09]
- A copy of the family's voucher [Notice PIH 2016-09]
- A copy of the family's most recent form HUD-50058, Family Report, or, if necessary, in the case of an applicant family, family and income information in a format similar to that of form HUD-50058 [24 CFR 982.355(c)(7), Notice PIH 2016-09]
- Copies of the income verifications backing up the form HUD-50058, including a copy of the family's current EIV data [24 CFR 982.355(c)(7), Notice PIH 2016-09]

HACSD Policy

In addition to these documents, the PHA will provide the following information, if available, to the receiving PHA:

Social security numbers (SSNs)

Documentation of SSNs for all nonexempt household members whose SSNs have not been verified through the EIV system

Documentation of legal identity

Documentation of citizenship or eligible immigration status

Documentation of participation in the earned income disallowance (EID) benefit

Documentation of participation in a family self-sufficiency (FSS) program

Initial Billing Deadline [Notice PIH 2016-09]

The deadline for submission of initial billing is 90 days following the expiration date of the voucher issued to the family by the initial PHA. In cases where suspension of the voucher delays the initial billing submission, the receiving PHA must notify the initial PHA of delayed billing before the billing deadline and document the delay is due to the suspension. In this case, the initial PHA must extend the billing deadline by 30 days.

If the initial PHA does not receive a billing notice by the deadline and does not intend to honor a late billing submission, it must notify the receiving PHA in writing. The initial PHA may report to HUD the receiving PHA's failure to comply with the deadline.

If the initial PHA will honor the late billing, no action is required.

HACSD Policy

The decision to accept late billing will be based on internal factors, including HACSD's leasing and funding status. If HACSD does not receive a billing notice from the receiving PHA within 90 days of the initial expiration date of the voucher, HACSD will contact the receiving PHA to determine the status of the family. If the family is not under lease, the HACSD may, based on available vouchers, advise the receiving PHA that it will not accept subsequent billings on behalf of the family. If subsequent billings are received after contact with the receiving PHA, the HACSD will return them and advise the receiving PHA to absorb the family. However, if the HACSD is advised at first contact that the family is under a HAP contract and the receiving PHA cannot absorb the family, the HACSD is required to accept the subsequent late billing.

The HACSD will allow an exception to this policy if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.

The HACSD will make its billing payments to the receiving PHA within 30 days of receiving Part II of form HUD-52665 from the receiving PHA and subsequent payments must be received by the receiving PHA no later than the fifth working day of each month.

Monthly Billing Payments [24 CFR 982.355(e), Notice PIH 2016-09]

If the receiving PHA is administering the family's voucher, the receiving PHA bills the initial PHA for housing assistance payments and administrative fees. When reimbursing for administrative fees, the initial PHA must promptly reimburse the receiving PHA for the lesser of 80 percent of the initial PHA ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee for each program unit under contract on the first day of the month for which the receiving PHA is billing the initial PHA under portability. If the administrative fees are prorated for the HCV program, the proration will apply to the amount of the administrative fee for which the receiving PHA may bill [24 CFR 982.355(e)(2)].

The initial PHA is responsible for making billing payments in a timely manner. The first billing amount is due within 30 calendar days after the initial PHA receives Part II of form HUD-52665 from the receiving PHA. Subsequent payments must be **received** by the receiving PHA no later than the fifth business day of each month. The payments must be provided in a form and manner that the receiving PHA is able and willing to accept.

The initial PHA may not terminate or delay making payments under existing portability billing arrangements as a result of over-leasing or funding shortfalls. The PHA must manage its tenant-based program in a manner that ensures that it has the financial ability to provide assistance for families that move out of its jurisdiction under portability and are not absorbed by receiving PHAs as well as for families that remain within its jurisdiction.

HACSD Policy

The HACSD, as the initial PHA, will utilize direct deposit to ensure that the payment is received by the deadline unless the receiving PHA notifies the initial PHA that direct deposit is not acceptable to them. If the initial PHA extends the term of the voucher, the receiving PHA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Annual Updates of Form HUD-50058

If the initial PHA is being billed on behalf of a portable family, it should receive an updated form HUD-50058 each year from the receiving PHA. If the initial PHA fails to receive an updated 50058 by the family's annual reexamination date, the initial PHA should contact the receiving PHA to verify the status of the family. The initial PHA must continue paying the receiving PHA based on the last form HUD-50058 received, unless instructed otherwise by HUD. The initial PHA may seek absorption of the vouchers by following steps outlined in Notice PIH 2016-09.

Denial or Termination of Assistance [24 CFR 982.355(c)(17)]

At any time, either the initial PHA or the receiving PHA may make a determination to deny or terminate assistance with the family in accordance with 24 CFR 982.552 and 24 CFR 982.553. (For PHA policies on denial and termination, see Chapters 3 and 12, respectively.)

If a PHA denies a family's move into its jurisdiction, the PHA must offer the family an opportunity for an informal hearing for participants, an informal review for new admissions, and submit its hearing/review determination to the family within 60 days of the hearing/review decision. [Notice PIH 2016-09].

If the family includes a person with disabilities, the PHA's decision to terminate the family's assistance is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

HACSD Policy

When the HACSD is terminating assistance, the presence of a disability is considered a mitigating circumstance during the informal review or informal hearing process, if the applicant did not respond to a request by the PHA for information due to a disability.

However, the presence of a disability is never considered a mitigating factor for certain criminal activities (conviction for drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing or a household member subject to a lifetime registration requirement under a State sex offender registration program).

12-II.E. TERMINATIONS RELATED TO DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT OR STALKING

This section describes the protections against termination of assistance that the Violence against Women Act of 2013 (VAWA) provides for victims of domestic violence, dating violence, sexual assault and stalking. For general VAWA requirements, key VAWA definitions, and PHA policies pertaining to notification, documentation, and confidentiality, see section 16-IX of

this plan.

VAWA Protections against Termination

VAWA provides four specific protections against termination of HCV assistance for victims of domestic violence, dating violence, sexual assault or stalking. (*Note:* The second, third, and fourth protections also apply to terminations of tenancy or occupancy by owners participating in the HCV program, as do the limitations discussed under the next heading.)

First, VAWA provides that a PHA may not terminate assistance to a family that moves out of an assisted unit in violation of the lease, with or without prior notification to the PHA, if the move occurred to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault or stalking and who reasonably believed they were imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.354(b)(4)].

Second, it provides that an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking may not be construed either as a serious or repeated lease violation by the victim or as good cause to terminate the assistance of the victim [24 CFR 5.2005(c)(1)].

Third, it provides that criminal activity directly related to domestic violence, dating violence, sexual assault or stalking may not be construed as cause for terminating the assistance of a tenant if a member of the tenant's household, a guest, or another person under the tenant's control is the one engaging in the criminal activity and the tenant or affiliated individual or other individual is the actual or threatened victim of the domestic violence, dating violence, or stalking [24 CFR 5.2005(c)(2)].

Fourth, it gives PHAs the authority to terminate assistance to any tenant or lawful occupant who engages in criminal acts of physical violence against family members or others without terminating assistance to, or otherwise penalizing, the victim of the violence [24 CFR 5.2009(a)].

Limitations on VAWA Protections [24 CFR 5.2005(d) and (e)]

Chapter 15 SPECIAL HOUSING TYPES

[24 CFR 982 Subpart M; New HCV GB, *Special Housing Types*]

INTRODUCTION

The PHA may permit a family to use any of the special housing types discussed in this chapter. However, the PHA is not required to permit families receiving assistance in its jurisdiction to use these housing types, except that PHAs must permit use of any special housing type if needed as a reasonable accommodation for a person with a disability. The PHA also may limit the number of families who receive HCV assistance in these housing types and cannot require families to use a particular housing type. No special funding is provided for special housing types.

Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601]. A single unit cannot be designated as more than one type of special housing. The PHA cannot give preference to households that wish to live in any of these types of housing and cannot require households to select any of these types of housing [New HCV GB, *Special Housing Types*, p.3].

HACSD Policy

Families will be permitted to utilize the special housing types as outlined in this chapter, unless otherwise specified.

This chapter consists of the following seven parts. Each part contains a description of the housing type and any special requirements associated with it. Except as modified by this chapter, the general requirements of the HCV program apply to special housing types.

Part I: Single Room Occupancy

Part II: Congregate Housing

Part III: Group Homes

Part IV: Shared Housing

Part V: Cooperative Housing

Part VI: Manufactured Homes (including manufactured home space rental)

Part VII: Homeownership

PART III: GROUP HOME

[24 CFR 982.610 through 982.614; Form HUD-52641; [New HCV GB, Special Housing Types](#), p. 8]

15-III.A. OVERVIEW

A group home is a state-approved (licensed, certified, or otherwise approved in writing by the state) facility intended for occupancy by elderly persons and/or persons with disabilities. Except for live-in aides, all persons living in a group home, whether assisted or not, must be elderly persons or persons with disabilities. Persons living in a group home must not require continuous medical or nursing care.

HACSD Policy

The HACSD will not approve assistance for a person to live in a group home if documentation indicates that the person needs continual medical or nursing care.

A group home consists of bedrooms for residents, which can be shared by no more than two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents.

No more than 12 persons may reside in a group home including assisted and unassisted residents and any live-in aides.

If approved by the HACSD, a live-in aide may reside with a person with disabilities. Other persons are not eligible to reside with the participant. The PHA must approve a live-in aide, if needed for an elderly person or as a reasonable accommodation, so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family. The standard form of the HAP contract is used (form HUD-62641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Group home."

15-III.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

Unless there is a live-in aide, the family unit size (voucher size) for an assisted occupant of a group home must be zero- or one-bedroom. If there is a live-in aide, the aide must be counted in determining the household's unit size.

The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the pro-rata share of the payment standard on the HACSD payment standards schedule for the group home size. The pro-rata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home. The number of persons in the assisted household equals one assisted person plus any PHA-approved live-in aide.

The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.

The utility allowance for each assisted occupant in a group home is the pro-rata share of the family unit size to the utility allowance for the group home.

The rents paid for participants residing in group homes must be reasonable in accordance with the rent reasonableness policies in the Plan. The rent for an assisted person must not exceed the pro-rata portion of the reasonable rent for the group home. In determining reasonable rent, the

Chapter 16 - PROGRAM ADMINISTRATION

INTRODUCTION

This chapter discusses administrative policies and practices that are relevant to the activities covered in this plan. The policies are discussed in seven parts as described below:

Part I: Administrative Fee Reserve. This part describes the PHA's policies with regard to oversight of expenditures from its administrative fee reserve.

Part II: Setting Program Standards and Schedules. This part describes what payment standards are, and how they are updated, as well as how utility allowances are established and revised.

Part III: Informal Reviews and Hearings. This part outlines the requirements and procedures for informal reviews and hearings, and for informal hearings regarding citizenship status.

Part IV: Owner or Family Debts to the PHA. This part describes policies for recovery of monies that the PHA has overpaid on behalf of families, or to owners, and describes the circumstances under which the PHA will offer repayment agreements to owners and families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.

Part V: Section 8 Management Assessment Program (SEMAP). This part describes what the SEMAP scores represent, how they are established, and how those scores affect a PHA.

Part VI: Record-Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies the PHA will follow.

Part VII: Reporting and Record Keeping for Children with Elevated Blood Lead Level. This part describes the PHA's responsibilities for reporting, data collection, and record keeping relative to children with elevated blood lead levels that are less than six years of age and are receiving HCV assistance.

Part VIII: Determination of Insufficient Funding. This part describes the PHA's policies for determining if there is sufficient funding to issue vouchers, to approve moves to higher cost units or areas, and to continue assistance for all participant families.

Part IX: Violence against Women Act (VAWA): Notification, Documentation, Confidentiality. This part contains key terms used in VAWA and describes requirements related to notifying families and owners about their rights and responsibilities under VAWA; requesting documentation from victims of domestic violence, dating violence, sexual assault, and stalking; and maintaining the confidentiality of information obtained from victims.

PART I: ADMINISTRATIVE FEE RESERVE
[24 CFR 982.155]

The PHA must maintain administrative fee reserves, or unrestricted net position (UNP) for the program to pay program administrative expenses in excess of administrative fees paid by HUD for a PHA fiscal year.

HUD appropriations acts beginning with FFY 2004 have specified that administrative fee funding may be used only for activities related to the provision of HCV assistance, including related development activities.

Notice PIH 2012-9 cites two examples of related development activities: unit modification for accessibility purposes and development of project-based voucher units. Other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for “other housing purposes permitted by state and local law,” in accordance with 24 CFR 982.155(b)(1).

In addition, as specified in Notice PIH 2022-18, PHAs may use administrative fee funding for both administrative and “other expenses” needed to employ strategies and undertake activities beyond regular administrative responsibilities to facilitate the successful leasing and use of housing choice vouchers by families, such as through the use of security deposit assistance and landlord recruitment and incentive payments, among other allowable expenses specified in the notice. PHAs are also permitted to use UNP for these expenses [Notice PIH 2022-18].

If the PHA has not adequately administered any Section 8 program, HUD may prohibit use of funds in the administrative fee reserve and may direct the PHA to use funds in the reserve to improve administration of the program or to reimburse ineligible expenses. HUD may also prohibit the use of funds for certain purposes.

HUD requires the PHA Board of Commissioners or other authorized officials to establish the maximum amount that may be charged against the UNP account without specific approval.

HACSD Policy

Expenditures from the UNP account will be made in accordance with all applicable federal requirements. Expenditures will not exceed \$100,000 per occurrence without the prior approval of the PHA’s Board of Commissioners

PART II: SETTING PROGRAM STANDARDS AND SCHEDULES

16-II.A. OVERVIEW

Although many of the program's requirements are established centrally by HUD, the HCV program's regulations recognize that some flexibility is required to allow the PHA to adapt the program to local conditions. This part discusses how the PHA establishes and updates certain schedules and standards that are used to administer the program locally. Details about how these schedules are applied to individual families are provided in other chapters. The schedules and standards discussed here include:

- *Payment Standards*, which dictate the maximum subsidy a family can receive (application of the payment standards is discussed in Chapter 6); and
- *Utility Allowances*, which specify how a family's payment should be adjusted to account for tenant-paid utilities (application of utility allowances is discussed in Chapter 6).

HACSD Policy

The payment standard and utility allowance schedules are available for review on the HACSD website, by mail and at the HACSD's office during normal business hours.

The HACSD will maintain documentation to support its annual review of payment standards and utility allowance schedules. This documentation will be retained for at least 3 years.

Establishing and updating the PHA passbook rate, which is used to calculate imputed income from assets, is covered in Chapter 6 (see Section 6-I.G.).

16-II.B. PAYMENT STANDARDS [24 CFR 982.503; HCV GB]

The payment standard sets the maximum subsidy payment a family can receive from the PHA each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of rents in the market area.

The PHA must establish a payment standard schedule that establishes payment standard amounts for each FMR area within the PHA's jurisdiction, and for each unit size within each of the FMR areas. For each unit size, the PHA may establish a single payment standard amount for the whole FMR area, or may set different payment standards for different parts of the FMR area. Unless HUD grants an exception, the PHA is required to establish a payment standard within a "basic range" established by HUD – between 90 and 110 percent of the published FMR for each unit size.

HACSD Policy

On November 16, 2016, HUD published the Small Area Fair Market Rents (SAFMR) Final Rule. The rule provides that in lieu of determining Housing Choice Voucher (HCV) payment standards using a metropolitan area-wide Fair Market Rent (FMR), payment standards will use FMRs calculated for ZIP codes within metropolitan areas. SAFMRs are required to be used in areas designated by HUD. The San Diego metropolitan area was designated to use SAFMRs in determining payment standards. HACSD implemented the use of SAFMRs effective October 1, 2018.

The payment standard is the basis for calculating the maximum subsidy a family may receive. In accordance with HUD regulation, and at the HACSD's discretion, the voucher payment standard amount is between 90 percent and 110 percent of the HUD published SAFMR. This is considered the basic range. The HACSD reviews the appropriateness of the payment standard annually upon publication of the new SAFMRs. The HACSD may at any time make the administrative decision to adopt a payment standard that is from 90 percent to 110 percent of the most recently published SAFMR, unless HUD approves an exception payment standard.

For each SAFMR area, the HACSD will establish payment standard amounts for each unit size. The HACSD, subject to available funding, may adopt a SAFMR of up to 110 percent of SAFMR if needed to expand housing opportunities outside areas of minority or poverty concentration. The HACSD may request an exception payment standard or adopt a higher payment standard for its Section 8 Homeownership participants.

The HACSD, if funding is available, may approve a higher payment standard up to 120 percent of SAFMR as a reasonable accommodation for a family that includes a person with disabilities. The HACSD's policies and practices are designed to provide reasonable accommodations to persons with disabilities, upon request, so they may fully access and utilize the housing program and related services.

Upon release of SAFMRs, the HACSD must update its payment standards, if the payment standards are no longer within the basic range of 90-110 percent of the current SAFMR.

The HACSD may review its payment standards in the following situations:

- Upon release of new SAFMRs

- Upon funding changes

- Upon management directive

The HACSD may also review its payment standards to determine if a payment standard change could alleviate participants excessive rent burden, improve the quality of assisted units, increase unit availability, decrease lease-up time, or improve voucher utilization or success rate.

SAFMRs are required to be used in all tenant-based HCV programs including special purpose vouchers such as Veterans Affairs Supportive Housing (VASH) and Mainstream vouchers. SAFMRs are not required to be used to determine payment standards for project-based vouchers and other, non-HCV, rental assistance programs which HACSD administers. The area wide FMR will continued to be used for those applicable programs.

The payment standards may be changed at any time and payment standards increases will not be applied retroactively to completed recertifications.

Updating Payment Standards

When HUD updates its FMRs, the PHA must update its payment standards if the standards are no longer within the basic range [24 CFR 982.503(b)]. HUD may require the PHA to make further adjustments if it determines that rent burdens for assisted families in the PHA's jurisdiction are unacceptably high [24 CFR 982.503(g)].

HACSD Policy

Payment standards may be adjusted, depending on available funding, within HUD regulatory and financial limitations, to increase housing assistance payments to keep family rents affordable. The HACSD will not raise payment standards solely to make "high end" units available to voucher holders. The HACSD may use some or all of the measures below in making its determination of whether an adjustment should be made to the payment standards.

Assisted Families' Rent Burdens

If it is determined that there is a decline in the number of families successfully leasing into an eligible unit prior to the expiration of their vouchers, the HACSD may review its voucher payment standard amounts to determine whether more than 40 percent of families in a particular unit size are paying more than 30 percent of their annual adjusted income for rent.

If it is determined that the rents of particular unit sizes in the HACSD's jurisdiction are creating rent burdens for families, the HACSD may modify its payment standards for those particular unit sizes.

The HACSD may establish a separate voucher payment standard, within the basic range, for designated parts of its jurisdiction, if it determines that a higher payment standard is needed in these designated areas to provide families with quality housing choices and to give families an opportunity to move outside areas of high poverty or into neighborhoods with greater opportunity.

Quality of Units Selected

The HACSD may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing to ensure that payment standard increases are needed to reach the mid-range of the market.

Families Rent Burden Analysis

The HACSD may review the average percent of income that families on the program are paying for rent. If more than 40 percent of families are paying more than 30 percent of monthly-adjusted income for a particular unit size, the HACSD may evaluate the number of families renting units larger than their voucher size, or luxury or high-end units.

If families are paying more than 30 percent of their income for rent due to the selection of larger bedroom size units or luxury units, the HACSD will decline to increase the payment standard. If this is not the primary reason for families' rent burden, the HACSD will continue increasing the payment standard within HUD regulatory limitations.

Rent to Owner Increases

The HACSD may review a sample of the units to determine how often owners are increasing rents and the average percent of increase by bedroom size.

Time to Locate Housing

The HACSD may consider the average time period for families to lease up under the voucher program. If voucher holders are unable to locate suitable housing within their voucher term due to unaffordable rents and funding permits, the payment standard may be adjusted.

Lowering of the Payment Standard

Lowering of the SAFMRs may require an adjustment of the payment standard. Additionally, statistical analysis may reveal that the payment standard should be lowered. In any case, the payment standard will not be set below 90 percent of the SAFMR without authorization from HUD.

Financial Feasibility

Before increasing the payment standard, the HACSD may review its budget to determine the impact of projected subsidy increases on funding available for the program and the number of families served.

For this purpose, the HACSD will compare the number of families served under higher payment standards to the number assisted under current payment standards.

Exception Payment Standards [24 CFR 982.503(c), Notice PIH 2018-01, FR Notice 9/27/21]

For designated SAFMR PHAs and Opt-in SAFMR PHAs HUD will issue a separate Federal Register notice proposing conditions and procedures under which a PHA using SAFMRs may request HUD approval to establish an exception payment standard that exceeds 110 percent of the SAFMR. The requirements at 24 CFR §982.503(c) do not apply to such requests.

HUD allows PHAs to establish a HUD-Veterans Affairs Supportive Housing (HUD-VASH) exception payment standard. (See Section 19-IV.F.).

Unit-by-Unit Exceptions [24 CFR 982.503(b), 24 CFR 982.505(d), Notice PIH 2010-26]

Unit-by-unit exceptions to the PHA's payment standards generally are not permitted. However, an exception may be made as a reasonable accommodation for a family that includes a person with disabilities. (See Chapter 2 for a discussion of reasonable accommodations.) This type of exception does not affect the PHA's payment standard schedule.

When needed as a reasonable accommodation, the PHA may make an exception to the payment standard without HUD approval if the exception amount does not exceed 120 percent of the applicable FMR for the unit size [24 CFR 982.503(b)]. The PHA may request HUD approval for an exception to the payment standard for a particular family if the required amount exceeds 120 percent of the FMR.

HACSD Policy

The HACSD, if funding is available, may approve a higher payment standard up to 120 percent of SAFMR as a reasonable accommodation for a family that includes a person with disabilities. The HACSD's policies and practices are designed to provide reasonable accommodations to persons with disabilities, upon request, so they may fully access and utilize the housing program and related services.

Decreases in the Payment Standard below the Basic Range [24 CFR 982.503(d)]

The PHA must request HUD approval to establish a payment standard amount that is lower than the basic range. At HUD's sole discretion, HUD may approve establishment of a payment standard lower than the basic range. HUD will not approve a lower payment standard if the family share for more than 40 percent of program participants exceeds 30 percent of adjusted monthly income.

16-II.C. UTILITY ALLOWANCES [24 CFR 982.517]

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. The PHA must maintain a utility allowance schedule for (1) all tenant-paid utilities, (2) the cost of tenant-supplied refrigerators and ranges, and (3) other tenant-paid housing services such as trash collection.

The utility allowance schedule must be determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the PHA must use normal patterns of consumption for the community as a whole, and current utility rates.

The utility allowance must include the utilities and services that are necessary in the locality to provide housing that complies with housing quality standards. Costs for telephone, cable/satellite television, and internet services are not included in the utility allowance schedule.

In the utility allowance schedule, the PHA must classify utilities and other housing services according to the following general categories: space heating; air conditioning; cooking; water heating; water; sewer; trash collection; other electric; cost of tenant-supplied refrigerator; cost of tenant-supplied range; and other specified housing services.

The cost of each utility and housing service must be stated separately by unit size and type.

Utility Allowance and Utility Reimbursement Payments

HACSD Policy

The same utility allowance schedule is used for all tenant-based programs and dwelling types. Changes in utility allowances will be applied at the family's first annual reexamination that is being processed after the effective date of the utility allowance change.

When families, including mobile home owners and HCV Homeownership participants, provide their own range and refrigerator, the HACSD will establish an allowance adequate for the family to purchase or rent a range or refrigerator, even if the family already owns either appliance.

Utility allowances for family provided stove and/or refrigerator will not be given if the owner has available a stove and/or refrigerator, but it is the family's preference to provide its own appliances.

When the calculation on the HUD 50058 results in a utility reimbursement payment due the family [24 CFR 5.632], the HACSD will provide a utility reimbursement payment for the family each month. The check or direct deposit will be issued directly to the family.

Air Conditioning

An allowance for tenant-paid air conditioning will be provided in those cases where the majority of housing units in the market have central air conditioning or are wired for tenant installed air conditioners [24 CFR 982.517].

Reasonable Accommodation

HCV program regulations require a PHA to approve a utility allowance amount higher than shown on the PHA's schedule if a higher allowance is needed as a reasonable accommodation for a family member with a disability.

HACSD Policy

A person with a disability who provides medical verification of higher utility costs due to the disability may receive a higher utility allowance of 10 percent over the standard utility allowance for the utility that is more costly due to that person's disability.

Utility Allowance Revisions

The PHA must review its schedule of utility allowances each year, and must revise the utility allowance schedule if there has been a change of 10 percent or more in any utility rate since the last time the allowance for that utility was revised.

The PHA must maintain information supporting its annual review of utility allowance and any revisions made in its utility allowance schedule.

HACSD Policy

Revised utility allowances will be applied in a participant family's rent calculation at the next reexamination.

The approved utility allowance schedule is given to families along with their voucher. The utility allowances are based on the lower of the actual size of the unit the family selects or the family's voucher size.

PART III: INFORMAL REVIEWS AND HEARINGS

16-III.A. OVERVIEW

Both applicants and participants have the right to disagree with, and appeal, certain decisions of the PHA that may adversely affect them. PHA decisions that may be appealed by applicants and participants are discussed in this section.

The process for applicant appeals of PHA decisions is called the “informal review.” For participants (or applicants denied admission because of citizenship issues), the appeal process is called an “informal hearing.” PHAs are required to include informal review procedures for applicants and informal hearing procedures for participants in their administrative plans [24 CFR 982.54(d)(12) and (13)].

16-III.B. INFORMAL REVIEWS

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program but is not yet a participant in the program. Informal reviews are intended to provide a “minimum hearing requirement” [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements [*Federal Register* 60, no. 127 (3 July 1995): 34690].

Decisions Subject to Informal Review

The PHA must give an applicant the opportunity for an informal review of a decision denying assistance [24 CFR 982.554(a) and (c)].

- Denial of assistance may include any or all of the following [24 CFR 982.552(a)(2)]:
- Denying listing on the PHA waiting list
- Denying or withdrawing a voucher
- Refusing to enter into a HAP contract or approve a lease
- Refusing to process or provide assistance under portability procedures.

Informal reviews are *not* required for the following reasons [24 CFR 982.554(c)]:

- Discretionary administrative determinations by the PHA
- General policy issues or class grievances
- A determination of the family unit size under the PHA subsidy standards
- A PHA determination not to approve an extension or suspension of a voucher term
- A PHA determination not to grant approval of the tenancy
- A PHA determination that the unit is not in compliance with the HQS
- A PHA determination that the unit is not in accordance with the HQS due to family size or composition

HACSD Policy

The HACSD will only offer an informal review to applicants for whom assistance is being denied. Denial of assistance includes denying listing on the PHA waiting list; denying or

withdrawing a voucher; refusing to enter into a HAP contract or approve a lease; refusing to process or provide assistance under portability procedures.

When the HACSD denies a preference to an applicant, the family will be notified in writing of the specific reason for the denial and offered the opportunity for a meeting with the HACSD staff to discuss the reasons for the denial and to dispute the HACSD's decision. The person who conducts the meeting will be the intake supervisor or designee, or an employee of the HACSD who is at or above the level of Housing Specialist I, but not the employee who made the determination.

Notice to the Applicant [24 CFR 982.554(a)]

The PHA must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reasons for the PHA decision and must also state that the applicant may request an informal review of the decision. The notice must describe how to obtain the informal review.

Scheduling an Informal Review

HACSD Policy

A request for an informal review must be made in writing and delivered to the HACSD either in person or by first class mail, by the close of the business day, no later than 14 calendar days from the date of the HACSD's notification of denial of admission.

The HACSD will ensure applicants receive all the rights afforded by laws and regulations. The HACSD shall schedule the informal review within 30 days of the family's request and conduct the review within 60 days of the date the request was received.

The informal review may be conducted by telephone or in person. The applicants will be advised of the time and date of the informal review and the right to submit oral or written objections to the HACSD decision.

If the informal review will be conducted remotely, at the time HACSD notifies the family of the informal review, the family will be informed:

- Regarding the processes to conduct a remote informal review;
- That, if needed, HACSD will provide technical assistance prior to and during the informal review; and
- That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal review, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal review, as appropriate.

Informal Review Procedures [24 CFR 982.554(b)]

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of the PHA.

HACSD Policy

Upon HACSD determination of applicant ineligibility, the family must be notified in writing. The notice must contain:

The reason(s) the family is ineligible;

The procedure for requesting a review, if the applicant does not agree with the decision;

The deadline to request a review.

When denying admission for criminal activity as shown by a criminal record, the HACSD will allow the family to review the criminal record at the HACSD office upon family request.

The HACSD and the family may present evidence and witnesses. An attorney or other representatives may accompany the family at the family's own expense.

All requests for a review, supporting documentation, and a copy of the final decision will be retained in the family's file.

Requests for postponement will be granted only if there is evidence that indicates the postponement is necessary due to reasons beyond the control of parties involved (for example: hospitalization, auto accident, etc.). Verification of the reason(s) must be provided to the HACSD in writing and must cover the review date before a new review will be scheduled.

A reasonable accommodation request based on a family member's disability must be provided in orally or in writing prior to the scheduled informal review.

The person who conducts the meeting will be a designee of the Intake Supervisor or an employee who is at or above the level of Housing Specialist I who meets the eligibility criteria outlined in this section.

Remote Informal Reviews [Notice PIH 2020-32]

There is no requirement that informal reviews be conducted in person. HUD allows PHAs to conduct all or a portion of their informal review remotely, either over the phone, via video conferencing, or through other virtual platforms. If the PHA choose to conduct remote informal reviews, applicants may still request an in-person informal review, as applicable.

HACSD Policy

HACSD has the sole discretion to require that informal reviews be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.

In addition, HACSD will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have childcare or transportation that would enable them to attend the informal review, or if the applicant believes an in-person informal review would create an undue health risk. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis.

Ensuring Accessibility for Persons with Disabilities and LEP Individuals

As with in-person informal reviews, the platform for conducting remote informal reviews must be accessible to persons with disabilities and the informal review must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with

PART V: SECTION 8 MANAGEMENT ASSESSMENT PROGRAM (SEMAP)

16-V.A. OVERVIEW

The Section 8 Management Assessment Program (SEMAP) is a tool that allows HUD to measure PHA performance in key areas to ensure program integrity and accountability. SEMAP scores translate into a rating for each PHA as high performing, standard, or troubled. Scores on individual SEMAP indicators, as well as overall SEMAP ratings, can affect the PHA in several ways.

- High-performing PHAs can be given a competitive advantage under notices of funding availability [24 CFR 985.103].
- PHAs with deficiencies on one or more indicators are required to correct the deficiencies and report to HUD [24 CFR 985.106].
- PHAs with an overall rating of “troubled” are subject to additional HUD oversight, including on-site reviews by HUD staff, a requirement to develop a corrective action plan, and monitoring to ensure the successful implementation of the corrective action plan. In addition, PHAs that are designated “troubled” may not use any part of the administrative fee reserve for other housing purposes [24 CFR 985.107].
- HUD may determine that a PHA's failure to correct identified SEMAP deficiencies or to prepare and implement a corrective action plan required by HUD constitutes a default under the ACC [24 CFR 985.109].

16-V.B. SEMAP CERTIFICATION [24 CFR 985.101]

PHAs must submit the HUD-required SEMAP certification form within 60 calendar days after the end of its fiscal year. The certification must be approved by PHA board resolution and signed by the PHA executive director. If the PHA is a unit of local government or a state, a resolution approving the certification is not required, and the certification must be executed by the Section 8 program director.

Upon receipt of the PHA's SEMAP certification, HUD will rate the PHA's performance under each SEMAP indicator in accordance with program requirements.

HUD Verification Method

Several of the SEMAP indicators are scored based on a review of a quality control sample selected for this purpose. The PHA or the Independent Auditor must select an unbiased sample that provides an adequate representation of the types of information to be assessed, in accordance with SEMAP requirements [24 CFR 985.2].

If the HUD verification method for the indicator relies on data in the Form-50058 module (formerly known as MTCS) in the PIH Information Center (PIC), and HUD determines that those data are insufficient to verify the PHA's certification on the indicator due to the PHA's failure to adequately report family data, HUD will assign a zero rating for the indicator [24 CFR 985.3].

16-V.C. SEMAP INDICATORS

[24 CFR 985.3 and form HUD-52648]

SEMAP Indicators
Indicator 1: Selection from the waiting list
Indicator 2: Rent reasonableness
Indicator 3: Determination of adjusted income
Indicator 4: Utility allowance schedule
Indicator 5: HQS quality control inspections
Indicator 6: HQS enforcement
Indicator 7: Expanding housing opportunities <ul style="list-style-type: none"> Only applies to PHAs with jurisdiction in metropolitan FMR areas.
Indicator 8: FMR limit and payment standards
Indicator 9: Annual reexaminations
Indicator 10: Correct tenant rent calculations
Indicator 11: Pre-contract HQS inspections
Indicator 12: Annual HQS inspections
Indicator 13: Lease-up
Indicator 14: Family self-sufficiency (FSS) enrollment and escrow account balances <ul style="list-style-type: none"> Only applies to PHAs with mandatory FSS programs.
Success Rate of Voucher Holders <ul style="list-style-type: none"> Only applies to PHAs that have received approval to establish success rate payment standard amounts, and isn't effective until the second full PHA fiscal year following the date of HUD approval of success rate payment standard amounts.
Deconcentration Bonus Indicator

PART VI: RECORD KEEPING

16-VI.A. OVERVIEW

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

Records Monitoring

In addition to the required SEMAP documentation, the following functions will be monitored by supervisory staff:

- New applications and annual recertifications will be monitored for compliance with the regulations.
- All annual recertifications will be monitored for completion at least 30 days before the re-exam due date.
- All annual inspections will be monitored for completion at least 30 days before the due date or, if an annual inspection was not conducted due to biennial schedule, the file will be monitored to ensure that appropriate notification was given.

16-VI.B. RECORD RETENTION [24 CFR 982.158; 24 CFR 908.101]

During the term of each assisted lease, and for at least three years thereafter, the PHA must keep:

- A copy of the executed lease.
- The HAP contract; and
- The application from the family.

The PHA must keep the following records for at least three years:

- Records that provide income, racial, ethnic, gender and disability status data on program applicants and participants
- An application from each ineligible family and notice that the applicant is not eligible
- HUD required reports
- Unit inspection reports
- Lead-based paint records as required by 24 CFR 35, Subpart B
- Accounts and other records supporting PHA budget and financial statements for the program
- Records to document the basis for the PHA determination that rent to owner is reasonable rent (initially and during the term of the HAP contract)
- Other records specified by HUD

The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].

The PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].

Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.

The PHA must keep confidential records of all emergency transfers requested by victims of domestic violence, dating violence, sexual assault, and stalking under the PHA's Emergency Transfer Plan, as well as the outcomes of such requests, and retain the records for a period of three years [24 CFR 5.2005(e)(12)].

If an informal hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirement, see Section 16-III.D., Retention of Documents.

16-VI.C. RECORDS MANAGEMENT

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicants and participant files are maintained in a way that protects an individual's privacy rights.

HACSD Policy

All HACSD applicant and participant files and information will be kept in secure locations with access restricted to authorized personnel.

Privacy Act Requirements [24 CFR 5.212 and Form-9886]

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or HACSD may release the information collected.

Upfront Income Verification (UIV) Records

The PHA must adopt and follow specific security procedures to ensure that all EIV data is protected in accordance with federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in the HUD-issued document, *Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification data*.

HACSD Policy

HACSD staff will not discuss or disclose family information contained in files, upfront income verification (UIV) information, or third-party verifications, except for a lawful business reason. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action. Security access for the Enterprise Income Verification (EIV) systems will be reviewed quarterly and all users will have a signed user agreement on file. The HACSD will not disclose information obtained through the EIV system to any person other than the person to whom the income information pertains, even if another person has a release of information. In addition, the HACSD will not take any adverse action against the family as a result of information obtained from the EIV system but may take action if the information is confirmed by the family member or a third party.

Unauthorized persons may not remove files from secure storage areas including electronic storage systems.

The collection, maintenance, use and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of federal, state, and local law.

Criminal Records

The PHA must establish and implement a system of records management that ensures that any sex offender registration information received by the PHA from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation. However, a record of the screening, including the type of screening and the date performed must be retained [Notice PIH 2012-28]. This requirement does not apply to information that is public information or is obtained by a PHA other than under 24 CFR 5.905.

Medical/Disability Records

PHAs are not permitted to inquire about the nature or extent of a person's disability or about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA should not place this information in the tenant file; the PHA should destroy the document.

Documentation of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

For requirements and PHA policies related to management of documentation obtained from victims of domestic violence, dating violence, sexual assault, or stalking, see section 16-IX.E.

PART VII: REPORTING AND RECORD KEEPING FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVEL

16-VII.A. OVERVIEW

The PHA has certain responsibilities relative to children with elevated blood lead levels that are receiving HCV assistance. This part addresses the reporting requirements, and data collection and record keeping responsibilities that the PHA is subject to.

16-VII.B. REPORTING REQUIREMENT [24 CFR 35.1225(e); Notice PIH 2017-13]

The owner must report the name and address of a child identified as having an elevated blood lead level to the public health department within five business days of being so notified by any other medical health care professional. The owner must also notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days. The PHA may collaborate with the owner on the notification process, such as by agreeing with the owner to provide the required notifications on the owner's behalf.

HACSD Policy

The HACSD is required to report the name and address of a child identified as having an environmental intervention blood lead level to the public health department within five business days of being so notified by any other medical health care professional.

Upon notification by the owner, the HACSD will notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days.

16-VII.C. DATA COLLECTION AND RECORD KEEPING [24 CFR 35.1225(f)]

At least quarterly, the PHA must attempt to obtain from the public health department(s) with a similar area of jurisdiction, the names and/or addresses of children less than six years old with an elevated blood lead level and match this information with the names and addresses of families receiving HCV assistance.

HACSD Policy

The public health department has stated it does not wish to receive a quarterly report of an updated list of addresses of HCV units. Therefore, the HACSD will not provide this report.

PART VIII: DETERMINATION OF INSUFFICIENT FUNDING

16-VIII.A. OVERVIEW

The HCV regulations allow the PHA to deny families permission to move and to terminate Housing Assistance Payments (HAP) contracts if funding under the consolidated ACC is insufficient to support continued assistance [24 CFR 982.354(e)(1) and 982.454]. If HACSD denies a family a portability move based on insufficient funding, HACSD will notify the local HUD office within 10 business days [24 CFR 982.354]. Insufficient funding may also impact the PHA's ability to issue vouchers to families on the waiting list. This part discusses the methodology the PHA will use to determine whether or not the PHA has sufficient funding to issue vouchers, approve moves, and to continue subsidizing all families currently under a HAP contract.

16-VIII.B. METHODOLOGY

HACSD Policy

When funding is available, the HACSD issues vouchers to eligible applicants. The HACSD strives to issue enough vouchers to maintain a 100 percent lease-up rate, while managing within the available funding. The HACSD performs a monthly calculation to determine whether applications should be processed, the number of vouchers that can be issued, and to what extent vouchers can be over-issued (issue more vouchers than the budget allows to achieve maximum lease-up rate).

The HACSD may over-issue vouchers to the extent necessary to meet leasing goals, if funding is available. All over-issued vouchers will be honored, unless the HACSD has insufficient funds to support the voucher, in which case the voucher will be suspended until there is sufficient funding. If the HACSD finds it is over-leased, it must adjust its future issuance of vouchers so as not to exceed the Annual Contributions Contract (ACC) fiscal year budget limitations.

The regulations allow the HACSD to deny families permission to move and to terminate HAP contracts if funding under the consolidated ACC is insufficient to support annual program HAP expenses. If the HACSD determines that it has insufficient funding to support its active contracts, it may take any or all of the following actions that it deems appropriate and necessary to reduce its HAP costs:

1. Reduce payment standards, if payment standards exceed 90% of the current SAFMR;
2. Reduce its subsidy standards;
3. Eliminate exceptions to its subsidy standards;
4. Terminate HAP contracts;
5. Deny permission to move to higher cost units;
6. Deny permission to move.

If the HACSD determines that the necessary action to reduce HAP costs within the funding level is to terminate HAP contracts, it may take action to terminate HAP contracts based on one or more of the following criteria:

1. Terminate HAP contracts on units with gross rents that exceed the new payment standards and offer landlords new contracts under the current subsidy standards

and payment standards.

2. Terminate HAP contracts for program participants who have violated program requirements as evidenced by repayment agreements or signed documents acknowledging program violations.
3. Terminate HAP contracts for non-disabled, non-elderly, non-veterans and non-active-duty military households that have been on the program the longest.
4. Terminate HAP contracts for those participants whose tenant portion is at least 75 percent of the contract rent.
5. Terminate HAP contracts for participants living in units receiving other federal or state housing subsidies including, but not limited to tax credits, Section 236, HOME, Section 202, and Section 221.

HAP contracts based on targeted funding, such as special purpose vouchers, will be the last terminated due to insufficient funding. These include, but are not limited to, Mainstream Vouchers, Emergency Housing Vouchers (EHV), Veterans Affairs Supportive Housing Vouchers (VASH), and Family Unification Program (FUP) Vouchers.

Families terminated due to insufficient funding will be placed on the HCV waitlist and be eligible for the super preference referenced in Chapter 4-III.C. of this Plan once the HACSD resumes issuing vouchers to applicants.

PART IX: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY

16-IX.A. OVERVIEW

The Violence against Women Act of 2013 (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault and stalking who are applying for or receiving assistance under the housing choice voucher (HCV) program.

If your state or local laws provide greater protection for such victims, those laws apply in conjunction with VAWA.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and PHA policies in three areas: notification, documentation, and confidentiality. Specific VAWA requirements and PHA policies are located primarily in the following sections: 3-I.C, “Family Breakup and Remaining Member of Tenant Family”; 3-III.G, “Prohibition against Denial of Assistance to Victims of Domestic Violence, Dating Violence, and Stalking”; 10-I.A, “Allowable Moves”; 10-I.B, “Restrictions on Moves”; 12-II.E, “Terminations Related to Domestic Violence, Dating Violence, or Stalking”; and 12-II.F, “Termination Notice.”

16-IX.B. DEFINITIONS [24 CFR 5.2003, 42 USC 13925]

As used in VAWA:

- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members’ lease and occupancy rights are allowed to remain intact.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.
- The term *affiliated individual* means, with respect to a person:
 - A spouse, parent, brother or sister, or child of that individual, or an individual to whom that individual stands in the position or place of a parent; or
 - Any other individual, tenant, or lawful occupant living in the household of the victim of domestic violence, dating violence, sexual assault, or stalking.
- The term *sexual assault* means:
 - Any nonconsensual sexual act proscribed by federal, tribal, or state law, including when

the victim lacks the capacity to consent

- The term *stalking* means:
 - To engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or suffer substantial emotional distress.

16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]

Notification to Public

The HACSD adopts the following policy to help ensure that all actual and potential beneficiaries of its HCV program are aware of their rights under VAWA.

HACSD Policy

The HACSD will post the following information regarding VAWA in its offices and on its website. It will also make the information readily available to anyone who requests it.

A copy of the notice of occupancy rights under VAWA to housing choice voucher program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)

A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)

A copy of the HACSD's emergency transfer plan (Exhibit 16-3)

A copy of HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)

Contact information for local victim advocacy groups or service providers

Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)]

PHAs are required to inform program applicants and participants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

HACSD Policy

The HACSD will provide all applicants with information about VAWA at the time they request an application for housing assistance, as part of the written briefing packet, and at the time the family is admitted to the program. The HACSD will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

The HACSD will provide all participants with information about VAWA at the time of admission (see section 5-I.B) and at annual reexamination. The HACSD will also include information about VAWA in notices of termination of assistance, as provided in section 12-II.F.

The VAWA information provided to applicants and participants will consist of the notices in Exhibits 16-1 and 16-2.

The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the PHA make alternative delivery arrangements that will not put the victim at risk.

HACSD Policy

Whenever the HACSD has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

Notification to Owners and Managers

While PHAs are no longer required by regulation to notify owners and managers participating in the HCV program of their rights and obligations under VAWA, the PHA may still choose to inform them.

HACSD Policy

The HACSD will provide owners and managers with information about their rights and obligations under VAWA.

16-IX.D. DOCUMENTATION [24 CFR 5.2007]

A PHA presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, sexual assault, stalking, or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. The PHA may extend this time period at its discretion. [24 CFR 5.2007(a)]

The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

1. A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.
2. A federal, state, tribal, territorial, or local police report or court record, or an administrative record
3. Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; a mental

health professional; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

The PHA may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [VAWA final rule].

HACSD Policy

Any request for documentation of domestic violence, dating violence, sexual assault or stalking will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

The PHA may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, the PHA will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by the PHA will be in writing.

Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 business days.

Conflicting Documentation [24 CFR 5.2007(e)]

In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA. Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08].

The HACSD will honor any court orders issued to protect the victim or to address the distribution of property.

HACSD Policy

If presented with conflicting certification documents from members of the same household, the HACSD will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made.

When requesting third-party documents, the HACSD will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.

If the HACSD does not receive third-party documentation within the required timeframe (and any extensions) the HACSD will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied

or terminated from the program, the HACSD will hold separate hearings for the applicants

or tenants.

Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]

HACSD has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

HACSD Policy

If the HACSD accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault or stalking, the PHA will document acceptance of the statement or evidence in the individual's file.

Failure to Provide Documentation [24 CFR 5.2007(c)]

In order to deny relief for protection under VAWA, HACSD must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as the HACSD may allow, the HACSD may deny relief for protection under VAWA.

16-IX.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]

All information provided to the PHA regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence. This means that the PHA (1) may not enter the information into any shared database, (2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and (3) may not provide the information to any other entity or individual, except to the extent that the disclosure is (a) requested or consented to by the individual in writing, (b) required for use in an eviction proceeding, or (c) otherwise required by applicable law.

HACSD Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

**EXHIBIT 16-1: SAMPLE NOTICE OF OCCUPANCY RIGHTS UNDER THE
VIOLENCE AGAINST WOMEN ACT, FORM HUD-5380**

Housing Authority of the County of San Diego

Notice of Occupancy Rights under the Violence Against Women Act¹

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.² The U.S. Department of Housing and Urban Development (HUD) is the federal agency that oversees that the housing choice voucher program is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under the housing choice voucher program, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under the housing choice voucher program, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under the housing choice voucher program solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

1 Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

2 Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Removing the Abuser or Perpetrator from the Household

The **Housing Authority of the County of San Diego (HACSD)** may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If the **HACSD** chooses to remove the abuser or perpetrator, the **HACSD** may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, the **HACSD** must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, the **HACSD** must follow federal, state, and local eviction procedures. In order to divide a lease, the **HACSD** may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, the **HACSD** may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, the **HACSD** may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

1. **You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.
2. **You expressly request the emergency transfer.** Your housing provider may choose to require that you submit a form or may accept another written or oral request.
3. **You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

4. You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day **period before you request a transfer**. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

The **HACSD** will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

The **HACSD's** emergency transfer plan provides further information on emergency transfers, and the PHA must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

The **HACSD** can, but is not required to, ask you to provide documentation to “certify” that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such

request from the **HACSD** must be in writing, and the **HACSD** must give you at least 14 business days (Saturdays, Sundays, and federal holidays do not count) from the day you receive the request to provide the documentation. The **HACSD** may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to the **HACSD** as documentation. It is your choice which of the following to submit if the **HACSD** asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by the **HACSD** with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that they believe that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that the **HACSD** has agreed to accept.
- If you fail or refuse to provide one of these documents within the 14 business days, the **HACSD** does not have to provide you with the protections contained in this notice.

If the PHA receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), the **HACSD** has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, the **HACSD** does not have to provide you with the protections contained in this notice.

Confidentiality

The **HACSD** must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

The **HACSD** must not allow any individual administering assistance or other services on behalf of the **HACSD** (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

The **HACSD** must not enter your information into any shared database or disclose your information to any other entity or individual. The **HACSD**, however, may disclose the information provided if:

- You give written permission to the **HACSD** to release the information on a time limited basis.
- The **HACSD** needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires the PHA or your landlord to release the information.

VAWA does not limit the PHA's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted, and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, the PHA cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted, and your assistance terminated, if the PHA can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If the **HACSD** can demonstrate the above, the **HACSD** should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violation of these rights and seek additional assistance, if needed, by contacting or filing a complaint with **Housing Authority of the County of San Diego, 3938 Ruffin Rd, San Diego 92023** or the **HUD Southern California Office, 300 N. Los Angeles St. # 4054, Los Angeles, CA 90012; telephone: (213) 894-8000.**

For Additional Information

You may view a copy of HUD's final VAWA rule at: <https://www.gpo.gov/fdsys/pkg/FR-2016-11-16/pdf/2016-25888.pdf>.

Additionally, the PHA must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact **Housing Authority of the County of San Diego, 3938 Ruffin Rd, San Diego, CA 92123.**

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact **Break the Silence against Domestic Violence, 1-855-281-1777.**

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact **Center for Community Solutions, 858-272-1767.**

Victims of stalking seeking help may contact **San Diego County Stalking Unit, 619-515-8900.**

Attachment: Certification form HUD-5382

Chapter 17 - PROJECT-BASED VOUCHERS

INTRODUCTION

This chapter describes HUD regulations and PHA policies related to the project-based voucher (PBV) program in nine parts:

Part I: General Requirements. This part describes general provisions of the PBV program including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Owner Proposals. This part includes policies related to the submission and selection of owner proposals for PBV assistance. It describes the factors the PHA will consider when selecting proposals, the type of housing that is eligible to receive PBV assistance, the cap on assistance at projects receiving PBV assistance, subsidy layering requirements, site selection standards, and environmental review requirements.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Rehabilitated and Newly Constructed Units. This part describes requirements and policies related to the development and completion of rehabilitated and newly constructed housing units that will be receiving PBV assistance.

Part V: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution, term, and termination of the HAP contract. In addition, it describes how the HAP contract may be amended and identifies provisions that may be added to the HAP contract at the PHA's discretion.

Part VI: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VII: Occupancy. This part discusses occupancy requirements related to the lease and describes under what conditions families are allowed or required to move. In addition, exceptions to the occupancy cap (which limits PBV assistance to 25 percent of the units in any project) are also discussed.

Part VIII: Determining Rent to Owner. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract.

Rent reasonableness requirements are also discussed.

Part IX: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

17-I.A. OVERVIEW [24 CFR 983.5; FR Notice 1/18/17; Notice PIH 2017-21]

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its authorized units and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6]. PHAs may only operate a PBV program if doing so is consistent with the PHA's Annual Plan, and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)]. The project may be owned by any individual, corporation, trust, partnership, non-profit entity, as well as by the PHA, excluding those sanctioned from participation.

HACSD Policy

HACSD may contract, for a term to be identified by HACSD and in accordance with all current applicable guidelines and regulations, up to 20 percent of its authorized units for project-based assistance. HACSD may issue project-based vouchers in limited increments and in a manner consistent with a varied geographical distribution. These increments will be targeted to special needs populations as defined in the County of San Diego Consortium 2020-2024 Consolidated Plan. Project Based Vouchers may only be issued to projects located within the jurisdiction of the HACSD.

See the exhibits at the end of this chapter for information about projects to which the HACSD has attached PBV assistance.

PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52]. If PBV units are already selected for project-based assistance either under an agreement to enter into HAP Contract (Agreement) or a HAP contract, the PHA is not required to reduce the number of these units if the number of authorized units is subsequently reduced. However, the PHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC, regardless of whether the PHA has vouchers available for project-basing [FR Notice 1/18/17].

Moderate Rehabilitation PBV Conversions [Notice PIH 2019-23]

The Second component of the Rental Assistance Demonstration (RAD) allows owners of projects funded under the Moderate Rehabilitation (Mod Rehab) program to convert to Project-Based (PBV) contracts upon expiration or termination occurring after October 1, 2006. Mod-Rehab conversions are processed exclusively under the Second Component of RAD, which is non-competitive.

For information about Moderate Rehabilitation Conversion Projects and special provisions see Exhibit 17-1.

Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21; FR Notice 1/24/22]

The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the below categories as long as the total number of units does not exceed the 10 percent cap. For units under a HAP contract that was first executed on or after April 18, 2017, units qualify under this exception if they:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C.

11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.

- Are specifically made available to house families that are comprised of or include a veteran.
- *Veteran* means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.

PBV units that house eligible youth receiving FUPY/FYI assistance are also covered by this 10 percent exception authority if the units are under a HAP contract that became effective after December 27, 2020, and if the unit is occupied by an eligible youth receiving FUPY/FYI assistance. FYI TPVs that were awarded under Notice PIH 2019-20 are not part of this exception since PHAs are prohibited from project-basing FYI TPVs. Units added after December 27, 2020, are eligible for this 10 percent exception authority. In contrast, units added after December 27, 2020, through an amendment of a HAP contract that became effective on or prior to December 27, 2020, are not eligible for this 10 percent exception authority [FR Notice 1/24/22]. See Chapter 19 for policies specific to project-basing FUPY vouchers.

HACSD Policy

HACSD may project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements.

Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]

PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.

In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after April 18, 2017.

HACSD Policy

HACSD may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.

17-I.B. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]

Many of the provisions of the tenant-based voucher program regulations [24 CFR 982] also apply to the Project Based Voucher (PBV) program. Consequently, many of the PHA policies related to tenant-based assistance also apply to PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

HACSD Policy

Except as otherwise noted, or unless specifically prohibited by PBV program regulations, the HACSD policies for the tenant-based voucher program contained in this administrative plan also apply to the PBV program and its participants. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program.

The HACSD has established the following subsidy standard for all PBV developments: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

17-I.C. RELOCATION REQUIREMENTS [24 CFR 983.7]

Any persons displaced as a result of implementation of the PBV program must be provided relocation assistance in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) [42 U.S.C. 4201-4655] and implementing regulations at 49 CFR part 24.

The cost of required relocation assistance may be paid with funds provided by the owner, local public funds, or funds available from other sources. PHAs may not use voucher program funds to cover relocation costs, except that PHAs may use their administrative fee reserve to pay for relocation expenses after all other program administrative expenses are satisfied, and provided that payment of the relocation benefits is consistent with state and local law. Use of the administrative fee for these purposes must also be consistent with other legal and regulatory requirements, including the requirement in 24 CFR 982.155 and other official HUD issuances.

The acquisition of real property for a PBV project is subject to the URA and 49 CFR part 24, subpart B. It is the responsibility of the PHA to ensure the owner complies with these requirements.

17-I.D. EQUAL OPPORTUNITY REQUIREMENTS [24 CFR 983.8]

The PHA must comply with all equal opportunity requirements under federal law and regulations in its implementation of the PBV program. This includes the requirements and authorities cited at 24 CFR 5.105(a). In addition, the PHA must comply with the PHA Plan certification on civil rights and affirmatively furthering fair housing, submitted in accordance with 24 CFR 903.7(o).

PART II: PBV OWNER PROPOSALS

17-II.A. OVERVIEW

With certain exceptions, the PHA must describe the procedures for owner submission of PBV proposals and for PHA selection of PBV proposals [24 CFR 983.51]. Before selecting a PBV proposal, the PHA must determine that the PBV proposal complies with HUD program regulations and requirements, including a determination that the property is eligible housing [24 CFR 983.53 and 983.54], complies with the cap on the number of PBV units per project [24 CFR 983.56], and meets the site selection standards [24 CFR 983.57]. The PHA may not commit PBVs until or unless it has followed the proposal selection requirements defined in 24 CFR 983.51 [Notice PIH 2011-54].

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]

The PHA must select PBV proposals in accordance with the selection procedures in the PHA administrative plan. The PHA must select PBV proposals by either of the following two methods.

- **PHA request for PBV Proposals.** The PHA may solicit proposals by using a request for proposals to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.
- **The PHA may select proposal that were previously selected based on a competition.** This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition.

Units Selected Non-Competitively [FR Notice 1/18/17; Notice PIH 2017-21; 24 CFR 983.51(b)]

For certain public housing projects where the PHA has an ownership interest or control and will spend a minimum amount per unit on rehabilitation or construction, the PHA may select a project without following one of the two processes above.

This exception applies when the PHA is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP.

If the PHA is planning rehabilitation or new construction on the project, a minimum threshold of \$25,000 per unit in hard costs must be expended.

If the PHA plans to replace public housing by attaching PBV assistance to existing housing in which the PHA has an ownership interest or control, then the \$25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with HQS.

The PHA must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site.

HACSD Policy

Currently HACSD is not attaching PBVs to projects owned by the PHA as described above. HACSD may attach PBVs to projects owned by the PHA and will update this section accordingly with the project details.

Solicitation and Selection of PBV Proposals [24 CFR 983.51(c)]

The PHA's procedures for selecting PBV proposals must be designed and actually operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHA. The public notice procedures may include announcements via the PHA website, in publications of general circulation, via the PHA's industry partner organizations and other means designed and actually operated to provide broad public notice. The public notice of the PHA request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties.

HACSD Policy

The procedures for submission of PBV proposals and for HACSD selection of PBV proposals will be outlined in the HACSD public notification of any Requests for Proposals (RFPs).

Of importance to HACSD in reviewing project-based applications is:

- The extent to which the project contributes to the geographic distribution of affordable housing throughout the County of San Diego, promotes de-concentration of poverty, and furthers fair housing objectives;
- The extent to which special needs populations will be served and the level of corresponding supportive services;
- The project's ability to demonstrate local community support.

HACSD may advertise that it is accepting proposals using one or more of the following formats: BuyNet, newspapers and trade journals, website, emails, and through industry trade partners.

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

PHA Notice of Owner Selection [24 CFR 983.51(d)]

The PHA must give prompt written notice to the party that submitted a selected proposal and must also give prompt public notice of such selection. Public notice procedures may include publication of public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice.

HACSD Policy

The HACSD will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners who submitted proposals that were not selected. The selection date will be the date of the notification of selection.

17-II.C. HOUSING TYPE [24 CFR 983.52]

The PHA must decide what housing type, new construction, rehabilitation, or existing housing, will be used to develop project-based housing. The PHA choice of housing type must be reflected in its solicitation for proposals.

The PHA may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an agreement to enter into a housing assistance payments contract that was executed prior to the start of construction. A housing unit is considered an existing unit for purposes of the PBV program, if, at the time of notice of PHA selection, the units substantially comply with HQS. Units for which new construction or rehabilitation began after the owner's proposal submission but prior to the execution of the HAP do not subsequently qualify as existing housing. Units that were newly constructed or rehabilitated in violation of program requirements also do not qualify as existing housing.

Project must be in compliance with all relevant federal, state and local laws, as well as all zoning and other regulatory requirements. Taxes, fees, assessments, insurance, mortgages, or any other debts related to the projects must be kept current. The project must be maintained in accordance with the provisions of the contract. Project owners must take prompt action against residents engaging in illegal activities on the premises.

17-II.D. PROHIBITION OF ASSISTANCE FOR CERTAIN UNITS

Ineligible Housing Types [24 CFR 983.53]

The PHA may not attach or pay PBV assistance to shared housing units; units on the grounds of a penal reformatory, medical, mental, or similar public or private institution; nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (except that assistance may be provided in assisted living facilities); units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students; manufactured homes; and transitional housing. In addition, the PHA may not attach or pay PBV assistance for a unit occupied by an owner and the PHA may not select or enter into an agreement to enter into a HAP contract or HAP contract for a unit occupied by a family ineligible for participation in the PBV program. A member of a cooperative who owns shares in the project assisted under the PBV program is not considered an owner for purposes of participation in the PBV program. Finally, PBV assistance may not be attached to units for which construction or rehabilitation has started after the proposal submission and prior to the execution of an AHAP.

Subsidized Housing [24 CFR 983.54]

A PHA may not attach or pay PBV assistance to units in any of the following types of subsidized housing:

- A public housing unit;
- A unit subsidized with any other form of Section 8 assistance;
- A unit subsidized with any governmental rent subsidy;
- A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;
- A unit subsidized with Section 236 rental assistance payments (except that a PHA may attach assistance to a unit subsidized with Section 236 interest reduction payments);

PART VI: SELECTION OF PBV PROGRAM PARTICIPANTS

17-VI.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

17-VI.B. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

The PHA may select families for the PBV program from those who are participants in the PHA's tenant-based voucher program and from those who have applied for admission to the voucher program. For voucher participants, eligibility was determined at original admission to the voucher program and does not need to be redetermined at the commencement of PBV assistance. For all others, eligibility for admission must be determined at the commencement of PBV assistance.

HACSD Policy

The HACSD will determine an applicant family's eligibility for the PBV program in accordance with the policies in Chapter 3 or as otherwise specified in 24 CFR 983.2

Annual eligibility determination will be made of all families in units receiving project-based assistance.

In-Place Families [24 CFR 983.251(b)]

An eligible family residing in a proposed PBV contract unit on the date the proposal is selected by the PHA is considered an "in-place family." These families are afforded protection from displacement under the PBV rule. If a unit to be placed under contract (either an existing unit or a unit requiring rehabilitation) is occupied by an eligible family on the date the proposal is selected, the in-place family must be placed on the PHA's waiting list. Once the family's continued eligibility is determined (the PHA may deny assistance to an in-place family for the grounds specified in 24 CFR 982.552 and 982.553), the family must be given an absolute selection preference and the PHA must refer these families to the project owner for an appropriately sized PBV unit in the project. Admission of eligible in-place families is not subject to income targeting requirements.

This regulatory protection from displacement does not apply to families that are not eligible to participate in the program on the proposal selection date.

17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the HACSD may use a single waiting list for the HACSD's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

HACSD Policy

The HACSD will establish and manage separate waiting lists for project-based assistance. All those on the regular Section 8 waiting list will be given the opportunity to place their names on the project-based waiting lists. The HACSD may also place families referred by the PBV owner on its PBV waiting list.

If the HACSD determines a need for separate waiting lists, the HACSD will notify the public using one or more of the following methods:

- Notice to current regular Section 8 waiting list applicants;
- Publication in local newspapers to general circulation as well as minority media;
- Facebook postings;
- English and Spanish flyers in County libraries;
- Postings on HACSD's website;
- Twitter blasts to the public;
- County press releases; and
- Community meetings.

The HACSD currently has waiting lists for the following PBV projects:

- One list serves the Pine View complex in Fallbrook and the Vista Terrace complex in Vista. Applicants may designate a specified interest in one or both complexes.
- One list serves the Schmale Family Senior residence in Ramona.
- One list serves The Grove residence in Vista.
- One list serves the Villa de Vida residence in Poway.
- One list serves the Veterans Village San Diego of Escondido (VVSD Escondido) residence.
- One list serves the Villa Lakeshore residence in Lakeside.
- One list serves the El Cajon Seniors residence in El Cajon
- One list serves The Breezewood in Escondido
- One list serves the San Diego Youth Services Johnson Development in El Cajon
- One list serves the Estrella Development in San Marcos
- One list serves the Santa Fe Senior Village in Vista.

17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

Applicants who will occupy units with PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list. The PHA's preference system will work in combination with requirements to match the characteristics for the family to the type of unit available. For example, if a vacancy occurs in a two-bedroom unit, applicants will be selected based on established preferences as well as household size in accordance with subsidy standards.

Income Targeting [24 CFR 983.251(c)(6)]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely low-income families. The income targeting requirement applies to the total of admissions to both programs.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

HACSD Policy

Families will be selected from the waiting list in accordance with HACSD-established selection preferences identified in Chapter 4 of this Plan and/or as included in any MOU/MOA/HAP Contract or Amendments between the HACSD and a PBV provider, and/or as noted in the PBV Exhibits at the end of this chapter.

Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with "excepted units" for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

HACSD Policy

Families selected from the waiting list will be processed for eligibility in conformance with the regulations and the HACSD Section 8 Administrative Plan unless otherwise outlined in this Chapter. Families must meet income targeting guidelines in place at the time of selection from the waiting list. Families denied admission to the project will be returned to the waiting list, if eligible, with the appropriate selection preferences and original date and time of application.

In-place tenants will be given an absolute preference for selection off the HACSD's waiting list for the project. The term "in-place" tenants, means an eligible family residing in a proposed contract unit on the proposal selection date.

A preference may be given for services offered at a particular project and a preference may be given to persons with disabilities whose disabilities significantly interfere with their ability to obtain and maintain themselves in housing; who,

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without such services will not in the future be able to maintain themselves in housing; and for whom such services cannot be provided in a non-segregated community. Disabled residents cannot be required to accept the services being offered. The project may be advertised as being for a particular type of disability; however, the project must be open to all otherwise eligible persons with disabilities who may benefit from the services being offered.

The HACSD may establish selection criteria or preferences for occupancy of particular PBV units. HACSD's preference system will work in combination with requirements to match the characteristics for the family to the type of unit available. For example, if a vacancy occurs in a two-bedroom unit, applications will be selected based on established preferences as well as household size in accordance with subsidy standards.

For Project-Based Voucher (PBV) developments, the HACSD may establish different subsidy standards in order to meet the needs of a particular population or project. The HACSD has established the following subsidy standard for all PBV developments: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

17-VI.E. OFFER OF PBV ASSISTANCE

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 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.

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

Persons with Disabilities

If an applicant family's head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In

addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

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)].

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

HACSD Policy

The owner must notify the PHA in writing (mail, fax, or email) within five business days of learning about any vacancy or expected vacancy.

The PHA will make every reasonable effort to promptly refer a sufficient number of families to the owner to fill vacancies.

Reduction in HAP Contract Units Due to Vacancies [24 CFR 983.254(b)]

If any contract units have been vacant for 120 or more days since owner notice of the vacancy, the PHA may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (according to the bedroom size) that have been vacant for this period. If the PHA amends the contract the PHA will provide notice and the amendment to the HAP contract will be effective the first day of the month following the date of the PHA's notice.

17-VI.G. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. The PHA will not conduct screening to determine a PBV applicant family's suitability for tenancy.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

The PHA may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, or stalking except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(a)(4)].

HACSD Policy

The HACSD will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, at the time of the initial HQS inspection or before. The HACSD will not provide any additional information to the owner, such as tenancy history or criminal history, etc.

The HACSD will inform owners that it is the responsibility of the landlord to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, payment of utility bills, eviction history, respecting the rights of other residents, damage to units, drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

A statement of the HACSD's policy on release of information to prospective landlords is applied uniformly to all families and will be included in the family's briefing packet.

The owner may request the HACSD obtain and review criminal or sex-offender registration records for grounds to deny a tenant application or evict a tenant. The HACSD will charge the owner a fee based on the costs incurred by the HACSD, including the costs charged by the law enforcement agency, the HACSD staff time and administrative costs. The owner may not charge the tenant for this fee.

The HACSD must not release any criminal information or sex-offender information to the owner, but a Housing Supervisor will review the information, and if no information relevant to application or eviction is found, will notify the owner. If information relevant to the application or eviction is found, the Housing Supervisor will present their findings in writing to the Program Coordinator, who will authorize the findings and sign the letter issued to the owner. The letter will not specify the criminal or sex-offender history but will merely state that there may be cause for denial or eviction of the tenant. If the owner sends documentation of needing specific information for an eviction, the Program Coordinator must approve the release of any information in accordance with the regulations [24 CFR 5.903, 24 CFR 5.905].

The HACSD must NEVER release specific personal information to owners regarding their former Section 8 tenants.

Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills;
- Caring for a unit and premises;
- Respecting the rights of other residents to the peaceful enjoyment of their housing;
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and
- Compliance with other essential conditions of tenancy.

PART VII: OCCUPANCY

17-VII.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

17-VII.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

Form of Lease [24 CFR 983.256(b)]

The tenant and the owner must enter into a written lease agreement that is signed by both parties. If an owner uses a standard lease form for rental units to unassisted tenants in the locality or premises, the same lease must be used for assisted tenants, except that the lease must include a HUD-required tenancy addendum. The tenancy addendum must include, word-for-word, all provisions required by HUD.

If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such as a PHA model lease. The tenancy addendum must include, word-for-word, all provisions required by HUD.

The PHA may review the owner's lease form to determine if the lease complies with program requirements.

HACSD Policy

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

Lease Requirements [24 CFR 983.256(c)]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provide by the owner; and
- The amount of any charges for food, furniture, or supportive services.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements;

- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide);
- All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f)]

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g. month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The PHA terminates the HAP contract
- The PHA terminates assistance for the family

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by PHA policy. Per the Administrative Plan, a member of the household is considered permanently absent if the household member is away from the unit for six consecutive months or more in a 12-month period, except as otherwise provided in the Administrative Plan. A sole member is considered permanently absent if absent from the unit for 30 consecutive days. A sole member may be granted an extension of up to 180 consecutive days for medical reasons, as a reasonable accommodation for a disability or a family emergency. PHA termination of assistance actions due to family absence from the unit are subject to 24 CFR 981.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

Continuation of Housing Assistance Payments [24 CFR 982.258]

Housing assistance payments shall continue until the tenant rent equals the rent to owner. The cessation of housing assistance payments at such point will not affect the family's other rights under its lease, nor will such cessation preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within 180 days following the date of the last housing assistance payment by the PHA. After the 180-day period, the unit shall be removed from the HAP contract pursuant to 24 CFR 983.211.

HACSD Policy

If a participating family receiving zero assistance experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the HACSD of the change and request an interim reexamination before the expiration of the 180-day period.

Security Deposits [24 CFR 983.259]

The owner is not required to but is encouraged to collect a full security deposit from the tenant. Security deposits charged by owners may not exceed those charged to unassisted tenants, nor be more than the lessor of legal limitations or the maximum amount indicated on the lease.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

17-VII.C. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260]

If the PHA determines that a family is occupying a wrong size unit, based on the PHA's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the PHA must promptly notify the family and the owner of this determination, and the PHA must offer the family the opportunity to receive continued housing assistance in another unit.

HACSD Policy

In cases where, after initial tenancy, the family is occupying a wrong-sized unit based on the HACSD's subsidy standards or a unit that has accessibility features not required by the family and the unit is needed by a family that requires this accessibility feature, the HACSD will promptly notify the owner and the family of this determination. HACSD will offer the family continued assistance based in the following order, based on the availability of assistance:

PBV assistance in the same building or project;

PBV assistance in another project; and

Tenant-based voucher assistance

If the PHA offers the family a tenant-based voucher, the PHA must terminate the housing assistance payments for a wrong-sized or accessible unit at the earlier of the expiration of the term of the family's voucher (including any extension granted by the PHA) or the date upon which the family vacates the unit. If the family does not move out of the wrong-sized unit or accessible unit by the expiration of the term of the family's voucher, the PHA must remove the unit from the HAP contract.

If the PHA offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the PHA and remove the unit from the HAP contract.

HACSD Policy

When the PHA offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, the HACSD will terminate the housing assistance payments at the expiration of this 30-day period.

The HACSD may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

Family Right to Move [24 CFR 983.261]

The family may terminate the lease at any time after the first year of occupancy. Families may request tenant-based Housing Choice Vouchers after one year from the date that the lease is fully executed. 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 funding permits. 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. At that time, the next available tenant-based Housing Choice Vouchers or other assistance, will be offered to eligible families upon the discretion of the HACSD.

Emergency Transfers under VAWA [Notice PIH 2017-08]

Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

HACSD Policy

When the victim of domestic violence, dating violence, sexual assault, or stalking has lived in the unit for less than one year, the HACSD will provide several options for continued assistance.

The HACSD will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the HACSD has PBV units. The HACSD will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the HACSD's public housing program. Such a decision will be made by the PHA based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. The HACSD has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.

If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the PHA will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the PHA's public housing program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking as part of the public housing ACOP in order to expedite this process.

17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP [24 CFR 983.262]

As of April 17, 2018, the PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project

If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].

If a family at the time of initial tenancy is receiving and while the resident of an excepted unit has received Family Self-Sufficiency (FSS) supportive services or any other service as defined by the PHA and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit. However, if the FSS family fails to successfully complete the FSS contract of participation

or supportive services objective and consequently is no longer eligible for the supportive services, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA shall cease paying HAP on behalf of the family.

Further, when a family (or remaining members of a family) residing in an excepted unit no longer meets the criteria for a “qualifying family” because the family is no longer an elderly family due to a change in family composition, the PHA has the discretion to allow the family to remain in the excepted unit. If the PHA does not exercise this discretion, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA must cease paying housing assistance payments on behalf of the non-qualifying family.

Individuals in units with supportive services who choose to no longer participate in a service or who no longer qualify for services they qualified for at the time of initial occupancy cannot subsequently be denied continued housing opportunity because of this changed circumstance. A PHA or owner cannot determine that a participant’s needs exceed the level of care offered by qualifying services or require that individuals be transitioned to different projects based on service needs.

If the family fails to vacate the unit within the established time, the unit must be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the building in accordance with program requirements; or the owner terminates the lease and evicts the family. The housing assistance payments for a family residing in an excepted unit that is not in compliance with its family obligations to comply with supportive services requirements must be terminated by the PHA.

The PHA may allow a family that initially qualified for occupancy of an excepted unit based on elderly family status to continue to reside in a unit, where through circumstances beyond the control of the family (e.g., death of the elderly family member or long-term or permanent hospitalization or nursing care), the elderly family member no longer resides in the unit. In this case, the unit may continue to be counted as an excepted unit for as long as the family resides in that unit. Once the family vacates the unit, in order to continue as an excepted unit under the HAP contract, the unit must be made available to and occupied by a qualified family.

HACSD Policy

The HACSD will allow families who initially qualified to live in an excepted unit to remain when circumstances change due to circumstances beyond the remaining family members’ control.

In all other cases, the HACSD will provide written notice to the family and owner upon making the determination that the family no longer qualifies to reside in the excepted unit. The family will be given 90 days from the date of the notice to move out of the PBV unit. The PHA may approve additional extensions upon written request from the family as authorized by the appointing authority. The PHA will provide notification to the family of any decision to approve or deny a request for an extension.

If the family does not move out within this 90-day time frame or subsequent extensions, the PHA will terminate the housing assistance payments at the expiration of this 90-day period.

PART VIII: DETERMINING RENT TO OWNER

17-VIII.A. OVERVIEW

The amount of the initial rent to an owner of units receiving PBV assistance is established at the beginning of the HAP contract term. Although for rehabilitated or newly constructed housing, the agreement to enter into HAP Contract (Agreement) states the estimated amount of the initial rent to owner, the actual amount of the initial rent to owner is established at the beginning of the HAP contract term.

During the term of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a ten percent or greater decrease in the published FMR.

17-VIII.B. RENT LIMITS [24 CFR 983.301]

Except for certain tax credit units (discussed below), the rent to owner must not exceed the lowest of the following amounts:

- An amount determined by the PHA, not to exceed 110 percent of the applicable fair market rent (or any HUD-approved exception payment standard) for the unit bedroom size minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Certain Tax Credit Units [24 CFR 983.301(c)]

For certain tax credit units, the rent limits are determined differently than for other PBV units. Different limits apply to contract units that meet all of the following criteria:

- The contract unit receives a low-income housing tax credit under the Internal Revenue Code of 1986;
- The contract unit is not located in a qualified census tract;
- There are comparable tax credit units of the same bedroom size as the contract unit in the same project, and the comparable tax credit units do not have any form of rental assistance other than the tax credit; and
- The tax credit rent exceeds 110 percent of the fair market rent or any approved exception payment standard;

For contract units that meet all of these criteria, the rent to owner must not exceed the lowest of:

- The tax credit rent minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Definitions

A *qualified census tract* is any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent and where the census tract is designated as a qualified census tract by HUD.

Tax credit rent is the rent charged for comparable units of the same bedroom size in the project that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Reasonable Rent [24 CFR 983.301(e) and 983.302(c)(2)]

The PHA must determine reasonable rent in accordance with 24 CFR 983.303. The rent to owner for each contract unit may at no time exceed the reasonable rent, except in cases where the PHA has elected within the HAP contract not to reduce rents below the initial rent to owner and, upon redetermination of the rent to owner, the reasonable rent would result in a rent below the initial rent. However, the rent to owner must be reduced in the following cases:

- To correct errors in calculations in accordance with HUD requirements
- If additional housing assistance has been combined with PBV assistance after the execution of the initial HAP contract and a rent decrease is required pursuant to 24 CFR 983.55
- If a decrease in rent to owner is required based on changes in the allocation of the responsibility for utilities between owner and tenant

If the PHA has not elected within the HAP contract to establish the initial rent to owner as the rent floor, the rent to owner shall not at any time exceed the reasonable rent.

Use of FMRs, Exception Payment Standards, and Utility Allowances [24 CFR 983.301(f)]

When determining the initial rent to owner, the HACSD must use the most recently published FMR in effect and the utility allowance schedule in effect at execution of the HAP contract. When redetermining the rent to owner, the HACSD must use the most recently published FMR and the utility allowance schedule in effect at the time of redetermination. At its discretion, the PHA may for initial rent, use the amounts in effect at any time during the 30-day period immediately before the beginning date of the HAP contract, or for redeterminations of rent, the 30-day period immediately before the redetermination date.

Any HUD-approved exception payment standard amount under the tenant-based voucher program also applies to the project-based voucher program. HUD will not approve a different exception payment standard amount for use in the PBV program.

Likewise, the PHA may not establish or apply different utility allowance amounts for the PBV program. The same utility allowance schedule applies to both the tenant-based and project-based voucher programs.

HACSD Policy

Upon written request by the owner, the PHA will consider using the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent. The owner must explain the need to use the previous FMRs or utility allowances and include documentation in support of the request. The PHA will review and make a decision based on the circumstances and merit of each request.

In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.

Use of Small Area FMRs (SAFMRs) [24 CFR 888.113(h)]

While small area FMRs (SAFMRs) do not apply to PBV projects, PHAs that operate a tenant-based program under SAFMRs may apply SAFMRs to all future PBV HAP contracts. If the PHA adopts this policy, it must apply to all future PBV projects and the PHA's entire jurisdiction. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy.

Further, the PHA may apply SAFMRs to current PBV projects where the notice of owner selection was made on or before the effective date of PHA implementation, provided the owner is willing to mutually agree to doing so and the application is prospective. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy. If rents increase as a result of the use of SAFMRs, the rent increase may not be effective until the first anniversary of the HAP contract.

HACSD Policy

The HACSD will not apply SAFMRs to the HACSD's PBV program.

Redetermination of Rent [24 CFR 983.302]

The PHA must redetermine the rent to owner upon the owner's request or when there is a 10 percent or greater decrease in the published FMR.

Rent Increase

If an owner wishes to request an increase in the rent to owner from the PHA, it must be requested at the annual anniversary of the HAP contract (see Section 17-V.D.). The request must be in writing and in the form and manner required by the PHA. The PHA may only make rent increases in accordance with the rent limits described previously and if they conform with Sections 8-III.B and 9-I.H. There are no provisions in the PBV program for special adjustments (e.g., adjustments that reflect increases in the actual and necessary expenses of owning and maintaining the units which have resulted from substantial general increases in real property taxes, utility rates, or similar costs).

HACSD Policy

An owner's request for a rent increase must be submitted to the PHA 60 days prior to the anniversary date of the HAP contract and must include the new rent amount the owner is proposing.

The PHA may not approve and the owner may not receive any increase of rent to owner until and unless the owner has complied with requirements of the HAP contract, including compliance with HQS. The owner may not receive any retroactive increase of rent for any period of noncompliance.

Rent Decrease

If there is a decrease in the rent to owner, as established in accordance with program requirements such as a change in the FMR or exception payment standard, or reasonable rent amount, the rent to owner must be decreased regardless of whether the owner requested a rent adjustment, except where the PHA has elected within the HAP contract to not reduce rents below the initial rent under the initial HAP contract.

Notice of Rent Change

The rent to owner is redetermined by written notice by the PHA to the owner specifying the amount of the redetermined rent. The PHA notice of rent adjustment constitutes an amendment of the rent to owner specified in the HAP contract. The adjusted amount of rent to owner applies for the period of 12 calendar months from the annual anniversary of the HAP contract.

HACSD Policy

The HACSD will provide the owner with at least 30 days written notice of any change in the amount of rent to owner.

17-VIII.C. REASONABLE RENT [24 CFR 983.303]

At the time the initial rent is established and all times during the term of the HAP contract, the rent to owner for a contract unit may not exceed the reasonable rent for the unit as determined by the PHA, except where the PHA has elected within the HAP contract to not reduce rents below the initial rent under the initial HAP contract.

When Rent Reasonable Determinations Are Required

The PHA must redetermine the reasonable rent for a unit receiving PBV assistance whenever any of the following occur:

- There is a 10 percent or greater decrease in the published FMR in effect 60 days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR that was in effect one year before the contract anniversary date;
- The PHA approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- The HAP contract is amended to substitute a different contract unit in the same building or project; or
- There is any other change that may substantially affect the reasonable rent.

How to Determine Reasonable Rent

The reasonable rent of a unit receiving PBV assistance must be determined by comparison to rent for other comparable unassisted units. When making this determination, the PHA must consider factors that affect market rent. Such factors include the location, quality, size, type and age of the unit, as well as the amenities, housing services maintenance, and utilities to be provided by the owner.

Comparability Analysis

For each unit, the comparability analysis must use at least three comparable units in the private unassisted market. This may include units in the premises or project that is receiving project-based assistance. The analysis must show how the reasonable rent was determined, including major differences between the contract units and comparable unassisted units, and must be retained by the PHA. The comparability analysis may be performed by PHA staff or by another qualified person or entity. Those who conduct these analyses or are involved in determining the housing assistance payment based on the analyses may not have any direct or indirect interest in the property.

Owner Certification of Reasonable Rent

By accepting each monthly housing assistance payment, the owner certifies that the rent to owner is not more than rent charged by the owner for other comparable unassisted units in the premises. At any time, the PHA may require the owner to submit information on rents charged by the owner for other units in the premises or elsewhere.

17-VIII.D. EFFECT OF OTHER SUBSIDY AND RENT CONTROL

In addition to the rent limits discussed in Section 17-VIII.B above, other restrictions may limit the amount of rent to owner in a PBV unit. In addition, certain types of subsidized housing are not even eligible to receive PBV assistance (see Section 17-II.D).

Other Subsidy [24 CFR 983.304]

To comply with HUD subsidy layering requirements, at the discretion of HUD or its designee, a PHA shall reduce the rent to owner because of other governmental subsidies, including tax credits or tax exemptions, grants, or other subsidized funding.

For units receiving assistance under the HOME program, rents may not exceed rent limits as required by that program.

For units in any of the following types of federally subsidized projects, the rent to owner may not exceed the subsidized rent (basic rent) or tax credit rent as determined in accordance with requirements for the applicable federal program:

- An insured or non-insured Section 236 project;
- A formerly insured or non-insured Section 236 project that continues to receive Interest Reduction Payment following a decoupling action;
- A Section 221(d)(3) below market interest rate (BMIR) project;
- A Section 515 project of the Rural Housing Service;
- Any other type of federally subsidized project specified by HUD.

Combining Subsidy

Rent to owner may not exceed any limitation required to comply with HUD subsidy layering requirements.

Rent Control [24 CFR 983.305]

In addition to the rent limits set by PBV program regulations, the amount of rent to owner may also be subject to rent control or other limits under local, state, or federal law.

*must meet definition at the time of selection from the waiting list

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 4 remain applicable, including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	
Cooking	Electric	Tenant	
Water Heating			Owner
Other Electric		Tenant	
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning		Tenant	
Refrigerator			Owner
Range/Microwave			Owner

EXHIBIT 17-4: PBV DEVELOPMENT INFORMATION
VISTA TERRACE

DEVELOPMENT INFORMATION

Development Name: Vista Terrace Apartments

Address: 987 Postal Way, CA 92083

HAP CONTRACT

Effective Date of Contract: 8-20-2013

HOTMA Requirements: Pre-HOTMA

Term of HAP Contract: 15 Years

Expiration Date of Contract: 8-19-2028

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units			29	6			

Fixed or Floating: Floating

Accessible Units and Features: Yes

Target Population: Disabled or receiving supportive services

Excepted Units: 35

Supportive Services: Yes, see Exhibit D of HAP Contract.

Elderly Units: No

Disabled Units: Yes

FUPY/FYI Units: No

Located in a low-poverty census tract area? No

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Pine View complex in Fallbrook and the Vista Terrace complex in Vista. Applicants may designate a specified interest in one or both complexes.

Preferences: Same as HCV; Families will be selected in accordance with HACSD-established selection preferences for HCV identified in Chapter 4 as included in any MOU/MOA/HAP Contract Amendment between the HACSD and Vista Terrace. Vista Terrace will have weighted preferences as indicated:

- Category One- Disabled families who meet the residency preference criteria (see 4-III.C.)in the HACSD jurisdiction and have a specified interest in the Vista Terrace PBV Complex.
- Category Two- Disabled families who have a specified interest in the Vista Terrace PBV Complex.

*must meet the definition at the time of selection from the waiting list

The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	
Cooking	Electric	Tenant	
Water Heating			Owner
Other Electric		Tenant	
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning			
Refrigerator			Owner
Range/Microwave			Owner
Cable		Tenant	

EXHIBIT 17-5: PBV DEVELOPMENT INFORMATION
SCHMALE FAMILY SENIOR RESIDENCE

DEVELOPMENT INFORMATION

Development Name: Schmale Family Senior Residence

Address: 430 16TH St. Ramona, CA 92065

HAP CONTRACT

Effective Date of Contract: 7-12-2019

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: 7-11-2039

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units		50	11				

Fixed or Floating: Fixed

Accessible Units and Features:

Accessible Units: 7

Hearing/Vision impaired accessible units: 3

Handicap Parking Spaces: 6

Target Population: Elderly

Excepted Units: 46

Supportive Services: Yes, see Exhibit D of HAP Contract

Elderly Units: Yes

Disabled Units: No

FUPY/FYI Units: No

Located in a low-poverty census tract area? No

WAITING LIST AND SELECTION

Waiting List Type: One waiting list services the Schmale Family Senior Residence Complex.

Preferences: Same as HCV; Families will be selected in accordance with HACSD established selection preferences identified in Chapter 4 and as included in any

MOU/MOA/HAP Contract Amendment between the HACSD and Schmale Family Senior Residence. Schmale Family Senior Residence will have weighted preferences as indicated:

- Category One – Families having at least one member who is at least 62 years of age who meet the residency preference criteria (see 4-III.C.) in the HACSD jurisdiction
- Category Two – Families having at least one member who is at least 62 years of age
- The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	
Cooking	Electric	Tenant	
Water Heating	Gas		Owner
Other Electric		Tenant	
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning		Tenant	
Refrigerator			Owner
Range/Microwave			Owner
TV/Phone/Internet		Tenant	

**EXHIBIT 17-6: PBV DEVELOPMENT INFORMATION
THE GROVE**

DEVELOPMENT INFORMATION

Development Name: The Grove Apartments

Address: 811 Civic Center Dr., Vista, CA 92084

HAP CONTRACT

Effective Date of Contract: 10-29-2020

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: 10-28-2040

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units		20	4				

Fixed or Floating: Fixed

Accessible Units and Features: Units 117 and 317

Hearing/Vision Impaired Unit: Unit 210

Handicap-Accessible Parking Spaces: 6, including 1 van-accessible space

Elevators- 2 accessing all floors

Target Population: Elderly

Excepted Units: 24

Supportive Services: Yes, see Exhibit D of HAP Contract

Elderly Units: Yes

Disabled Units: No

FUPY/FYI Units: No

Located in a low-poverty census tract area? No

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Grove residence.

Preferences: Families will be selected from the waiting list in accordance with HACSD-established selection preferences identified in Chapter 4 of this Plan and as included in

any MOU/MOA/HAP Contract Amendment between the HACSD and the Grove residence. The Grove residence will have weighted preferences as indicated:

- Category One: Families who consist of household members 62 years or older or who meet the “qualified permanent resident” definition under CA Civil Code 51.3 and who meet the residency preference criteria (see Chapter 4-III.C.) in the HACSD jurisdiction
- Category Two: Families who consist of household members 62 years or older or who meet the “qualified permanent resident” definition under CA Civil Code 51.3

The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	
Cooking	Electric	Tenant	
Water Heating	Gas		Owner
Other Electric		Tenant	
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning		Tenant	
Refrigerator			Owner
Stove			Owner

EXHIBIT 17-7: PBV DEVELOPMENT INFORMATION
VILLA de VIDA

DEVELOPMENT INFORMATION

Development Name: Villa de Vida

Address: 12341 Oak Knoll Road, Poway, CA 92064

HAP CONTRACT

Effective Date of Contract: 5-27-2021

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: 5-26-2041

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units		50	3				

Fixed or Floating: Fixed

Accessible Units and Features: 9

Mobility Units (6)

Audible/visual Units (3)

Parking: 2 fully accessible handicap parking spaces and one loading space

Target Population: Individuals with developmental disabilities

Excepted Units: 53

Supportive Services: Yes, see Exhibit D of HAP Contract.

Elderly Units: No

Disabled Units: Yes

FUPY/FYI Units: No

Located in a low-poverty census tract area? No

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Villa de Vida Residence.

Preferences: Families will be selected from the waiting list in accordance with HACSD-established selection preferences identified in Chapter 4 of this Plan and as included in any MOU/MOA/HAP Contract Amendment between the HACSD and Villa de Vida, except:

- Category One: Primarily developmentally disabled families (or disabled families who can benefit from the services provided at the complex) who meet the residency preference criteria (see Chapter 4-III.C.) in the HACSD jurisdiction
- Category Two: Primarily developmentally disabled families (or disabled families who can benefit from the services provided at the complex)

The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Item	Fuel Type	Paid by
Heating	Electric	Tenant
Cooking	Electric	Tenant
Water Heating	Gas	Landlord
Other Electric		Tenant
Water		Landlord
Sewer		Landlord
Trash Collection		Landlord
Air Conditioning		Tenant
Other (Specify)		
		Provided by
Refrigerator		Landlord
Range/Microwave		Landlord

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EXHIBIT 17-8: PBV DEVELOPMENT INFORMATION
VETERANS VILLAGE SAN DIEGO OF ESCONDIDO (VVSD)

DEVELOPMENT INFORMATION

Development Name: Veterans Village San Diego of Escondido-VVSD Escondido

Address: 1540 S. Escondido Blvd, Escondido, CA 92025

HAP CONTRACT

Effective Date of Contract: October 1, 2020

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: September 30, 2040

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units		4*					

Fixed or Floating: Floating

*An additional unit may be added through a contract amendment for a total of 5 units.

Accessible Units and Features: There are seven (7) one-bedroom units equipped with mobility and communication accessibility features and a one (1) bedroom unit that is equipped with adaptable features.

Target Population: Veterans Affairs Supportive Housing (VASH) veterans

Excepted Units: None

Supportive Services: Yes, see Exhibit B of HAP Contract

The voluntary supportive services provided to VASH veterans at VVSD Escondido will be in coordination with VA staff. Provision of comprehensive case management services include individualized services planning and the provision of connections to mental health, substance abuse, employment, health, and housing retention.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves VVSD Escondido.

Preferences: Families will be selected from the waiting list in accordance with VASH program criteria identified in Chapter 19 of this Plan and as included in any MOU/MOA/HAP Contract Amendment between the HACSD and VVSD, including:

- Veterans referred from the Veterans Administration (VA) for Veterans

Administration Supportive Housing (VASH) and having a specified interest in VVSD Escondido

- Veterans referred from the Veterans Administration (VA) for Veterans Administration Supportive Housing (VASH) and having a specified interest in other PBV VASH properties

Preference Verification: Same as HCV VASH; see Chapter 19

Income Limit: See Chapter 19

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric		Owner
Cooking	Electric		Owner
Water Heating	Electric		Owner
Other Electric			Owner
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning			Owner
Refrigerator			Owner
Stove			Owner

EXHIBIT 17-11: PBV DEVELOPMENT INFORMATION
THE BREEZEWOOD
KINGDOM DEVELOPMENT INC.

DEVELOPMENT INFORMATION

Development Name: The Breezewood

Address: 1574 S. Escondido Boulevard, Escondido, CA 92025

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 years

Expiration Date of Contract: TBD

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units			14	9			23

Fixed or Floating: Floating

Accessible Units and Features: There are six (6) adaptable units and one (1) unit designated ADA and equipped for visual and hearing impaired.

Target Population: Seven (7) units will be designated for families experiencing homelessness or at risk of experiencing homelessness and contain at least one disabled adult household member.

Excepted Units: 23

Supportive Services: Yes, available to all 23 units, see Exhibit B of the HAP Contract

Kingdom Development, Inc will be the lead service provider and will be responsible for the provision of comprehensive case management services including individualized services planning and the provision of connections to mental health, substance abuse, employment, health, and housing retention. Services are to be available for all households, but voluntary participation.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Breezewood development.

- **Preferences:** Families will be selected from the waiting list in accordance with HACSD established selection preferences identified in Chapter 4 and as indicated in any MOU/MOA/HAP Contract or Amendment between the HACSD and the Breezewood. The Breezewood will have weighted preferences for seven (7) of the units using the following prioritization:
 - Experiencing homelessness or at risk of experiencing homelessness and
 - At least one adult disabled household member
- Category One for these seven units – Families referred through the Regional Taskforce on Homelessness agency members and meet the definition of homeless and referral criteria, as determined by HACSD/HCDSD programs.
- Category Two for these seven units – Families selected from the Breezewood waitlist that meet the two identified requirements above and who live or work (see the definition of working families) in the HACSD jurisdiction.
- Category Three for these seven units – Families selected from the Breezewood waitlist that meet the two identified requirements above.
- The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.
- The remaining sixteen units will be occupied by households selected from the Breezewood waitlist using the following prioritization:
 - Category One – Families who live or work (see definition of working families) in the HACSD jurisdiction.
 - Category Two – Families who do not live or work (see definition of working families) in the HACSD jurisdiction.
 - The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV: see Chapter 3, except targeted income does not apply to in-place tenants.

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standard guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

**EXHIBIT 17-12: PBV DEVELOPMENT INFORMATION
SAN DIEGO YOUTH SERVICES JOHNSON (EL CAJON)**

DEVELOPMENT INFORMATION

Development Name: Johnson (El Cajon)

Address: 302 S. Johnson Avenue, El Cajon, CA 92020

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units	4	1					5

Fixed or Floating: Floating

Accessible Units and Features: Facility rooms and common areas are ADA and CA State Title 24 compliant.

Target Population: Transitional aged youth from the ages of 18 to 24 years of age experiencing homelessness or at risk of homelessness.

Excepted Units: 5

Supportive Services: Yes, see Exhibit B of HAP Contract

The voluntary supportive services provided to youth at Johnson (El Cajon) will be in coordination with San Diego Youth Services staff. Provision of comprehensive case management services includes an individualized assessment to develop a strengths-based Life Plan. The Life Plan includes a Service Coordination and Referral Plan to ensure youth have access to all available resources through systems of care.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves Johnson (El Cajon).

Preferences: Families will be selected from the waiting list in accordance with SDYS program criteria as included in any MOU/MOA/HAP Contract Amendment between the HACSD and SDYS, including:

Youth referred from San Diego Youth Services and have a specified interest in Johnson (El Cajon).

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV, See Chapter 3, except targeted income does not apply to in-place tenants.

EXHIBIT 17-14: PBV DEVELOPMENT INFORMATION SANTA FE SENIOR VILLAGE

DEVELOPMENT INFORMATION

Development Name: Santa Fe Senior Village

Address: 414 North Santa Fe Avenue, Vista, CA 92083

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 years

Expiration of Contract: TBD

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	Total
# of Units	51	2				53

Fixed or Floating: Fixed

Accessible Units and Features: All units at Santa Fe Senior Village are ADA accessible allowing for greater flexibility for residents to age in place. Accessible routes of travel with 34" minimum clear opening width doorways at the unit entry and all interior passage doors. All bathrooms are fully accessible. There will be three ADA mobility units and 2 ADA communication units.

Target Population: Twenty-six units will be designated for families where all household members are 62 years of age or older. Twenty-five units will be designated for homeless or chronically homeless families with at least one member with a diagnosed serious mental illness, where all household members are 62 years of age or older. These units will be referred through Coordinated Entry System (CES) to County Behavioral Health Services (BHS). Two units will be Veterans Affairs Supportive Housing (VASH) program units designated for Veterans referred from the US Department of Veterans Affairs (VA), who have a specified interest in Santa Fe Senior Village and where all household members are 62 years of age or older.

Excepted Units: 53

Supportive Services: Yes, available to all 53 units. Services are to be available for all households, but participation is voluntary.

- Hope Through Housing Foundation services coordinator will provide 1 on 1 case management.
- San Ysidro Health and San Diego Program of All-Inclusive Care for the Elderly (PACE) will provide outreach and engagement and case management services.

Supportive services available based on unit target population:

- **County of San Diego's Health and Human Services Agency - Behavioral Health Services (BHS)** will be providing direct services for the 25 units referred through CES. BHS will be responsible for the provision of voluntary comprehensive case management services and individualized services for peer support, mental health and substance use, crisis counseling, individual and group therapy, peer support groups, referrals to physical health care, advocacy for services, and housing retention skills.
- **The San Diego VA** will provide case management and supportive services for VASH units. VASH services are designed to help homeless Veterans and their families obtain permanent housing and access the health care, mental health treatment, and other supports necessary to help them improve their quality of life and maintain housing over time.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Santa Fe Seniors Village development.

- Preferences: 26 units will be occupied by households selected from the Santa Fe Seniors Village waitlist and as indicated in any MOU/MOA/ HAP Contract or Amendment between HACSD and Santa Fe Senior Village using the following prioritization:
 - Category One – Families selected from the Santa Fe Senior Village meeting the following preference categories, as defined in Chapter 4 of the Admin Plan and as further defined below:
 - Elderly Preference, where all household members must be 62 years of age or older; and
 - HACSD Residency Preference
 - Category Two – Families selected from the Santa Fe Senior Village meeting the following preference categories, as defined in Chapter 4 of the Admin Plan and as further defined below:
 - Elderly Preference, where all household members must be 62 years of age or older.
 - HACSD will not process waiting list applications in subordinate category before all waiting list applications in a superior category has been processed.

Referral Based Units:

- 25 of the units will be filled through referrals from the Coordinated Entry System (CES) for households that meet the following:
 - Homeless or chronically homeless with at least one member with a diagnosed serious mental illness; and
 - Families where all household members are 62 years of age or older
- Two of the units will be filled through referrals from the VA.

Preference Verification: Same as HCV; see Chapter 4.

Income limit: Same as HCV; see Chapter 3.

Chapter 18 -PROJECT BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM

INTRODUCTION

This chapter describes HUD regulations and PHA policies related to the Project-Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program in eight parts:

Part I: General Requirements. This part describes general provisions of the PBV program, including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Project Selection. This part describes the cap on assistance at projects receiving PBV assistance, ownership and control, and site selection standards.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution and term of the HAP contract.

Part V: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VI: Occupancy. This part discusses occupancy requirements related to the lease and describes under what conditions families are allowed or required to move.

Part VII: Determining Contract Rent. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract.

Part VIII: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

18-I.A. OVERVIEW AND HISTORY OF THE RAD PROGRAM

The Rental Assistance Demonstration (RAD) program was authorized in 2012 in order to assess the effectiveness of converting public housing, moderate rehabilitation properties, and units under the rent supplement and rental assistance payments programs to long-term, project-based Section 8 rental assistance. The program's four primary objectives are to:

- Preserve and improve public and other assisted housing.
- Standardize the administration of the plethora of federally subsidized housing programs and rules. The conversions are intended to promote operating efficiency by using a Section 8 project-based assistance model that has proven successful and effective for over 30 years. In other words, RAD aligns eligible properties more closely with other affordable housing programs.
- Attract private market capital for property renovations. Through the use of this model, properties may be able to leverage private debt and equity to make capital repairs.
- Increase tenant mobility opportunities.

Under the first component, a PHA with public housing units may submit an application to HUD to convert some or all of their public housing units to long-term, project-based Section 8 HAP contracts under either:

- Project-based rental assistance (PBRA) under HUD's Office of Multifamily Housing Programs.
- Project-based vouchers (PBVs) under HUD's Office of Public and Indian Housing (PIH).

This chapter will focus on public housing conversions to the PBV program under RAD. In order to distinguish between requirements for public housing conversion under RAD and PBV units under the standard PBV program, we will refer to the standard PBV program and the RAD PBV program.

18-I.B. APPLICABLE REGULATIONS

On the whole, the regulations for both the standard and RAD PBV programs generally follow the regulations for the tenant-based HCV program found at 24 CFR Part 982. However, important parts of the tenant-based regulations do not apply to the project-based program. 24 CFR Part 983 outlines the sections of 24 CFR Part 982 that are not applicable to the project-based program.

For the RAD PBV program, Congress authorized HUD to waive certain statutory and regulatory provisions or establish alternative requirements from the standard PBV program. These provisions are identified in Notice PIH 2019-23 (issued September 5, 2019). Any non-RAD PBV units located in the covered project are subject to the same waivers and alternative requirements where noted in Notice PIH 2019-23 and in this policy.

Otherwise, all regulatory and statutory requirements for the standard PBV program in 24 CFR Part 983 and Section 8(o)(13) of the Housing Act of 1937, and all applicable standing and subsequent Office of Public and Indian Housing (PIH) notices and guidance, including related handbooks, apply to RAD PBV. This includes environmental review, Davis-Bacon, and fair housing requirements.

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act of 2014 (Public Law 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act of 2015 (Public Law 113-235, approved December 6, 2014), the Consolidated Appropriations Act of 2016 (Public Law 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Public Law 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Public Law 115-141, approved March 23, 2018) collectively, the “RAD Statute.”

Requirements specific to the RAD program may be found in the following:

- Generally, public housing projects converting assistance under RAD are bound by the terms of the notice in effect at the time of closing.
 - Notice PIH 2019-23 was immediately applicable at the time of closing to all projects converting assistance (notwithstanding execution of a commitment for conversion). Notice PIH 2019-23 was published on September 5, 2019.
 - Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period.
 - Notice PIH 2012-32, REV-3 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published January 12, 2017.
 - Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which were effective after a 30-day Notice PIH 2012-32, REV-2 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published June 15, 2015.
 - Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period.
- RAD Quick Reference Guide for Public Housing Converting to PBV Assistance (10/14)
- RAD Welcome Guide for New Awardees: RAD 1st Component (3/15)
- Notice PIH 2016-17, Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.
 - This Notice applies to all projects that have applied for RAD conversion but have not yet converted as of November 10, 2016.
- Notice PIH 2014-17, Relocation Requirements under the RAD Program, Public Housing in the First Component.
 - This notice may apply to projects that have converted to RAD prior to November 10, 2016, AND who have requested and received approval from HUD to be governed by this notice. See PIH Notice 2016-17, Section 1, Paragraph 1.3 for applicability.

NOTE: The policies in this chapter follow Notice PIH 2016-17. If your project falls under PIH 2014-17, applicable policies may be found in Section 18-I.D.

PART V: SELECTION OF PBV PROGRAM PARTICIPANTS

18-V.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

18-V.B. PROHIBITED RESCREENING OF EXISTING TENANTS UPON CONVERSION [Notice PIH 2019-23]

Current households cannot be excluded from occupancy at the covered project based on any rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. Post-conversion, the tenure of all residents of the covered project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified by Notice PIH 2019-23 (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family. Existing residents at the time of conversion may not be rescreened for citizenship status or have their social security numbers reverified.

Further, so as to facilitate the right to return to the assisted property, this provision must apply to current public housing residents of the converting project that will reside in non-RAD PBV units placed in a project that contain RAD PBV units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR 983 for non-RAD PBV. Any non-RAD PBV units located in the same project are also subject to the right to return.

For the RAD PBV program, *in-place family* means a family who lived in a pre-conversion property at the time assistance was converted from public housing to PBV under RAD.

18-V.C. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program. Applicants must qualify as a family as defined by HUD and the PHA, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)]. In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to the PHA's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. The PHA may also not approve a tenancy if the owner (including a principal or other interested party) of the unit is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless needed as a reasonable accommodation. An applicant family must also meet HUD requirements related to current or past criminal activity.

HACSD Policy

Policy will be established when conversion projects are determined.

18-V.D. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c); Notice PIH 2019-23]

The standard PBV regulations at 24 CFR 983.251 set out program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. Any non-RAD PBV units located in the same project are also subject to these requirements.

HACSD Policy.

Policy will be established when conversion projects are determined.

18-V.E. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

After conversion to RAD PBV, applicants who will occupy units with RAD PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units.

Income Targeting [24 CFR 983.251(c)(6); Notice PIH 2019-23]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

Families in place at the time of the conversion are exempt from income targeting requirements. New admissions follow standard PBV requirements. Any non-RAD PBV units located in the same project are also subject to these requirements.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

Preferences [24 CFR 983.251(d); FR Notice 11/24/08; Notice PIH 2019-23]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units.

HACSD Policy

Policy will be established when conversion projects have been determined.

18-V.F. OFFER OF PBV ASSISTANCE

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:

- Refusing to list the applicant on the waiting list for tenant-based voucher assistance
- Denying any admission preference for which the applicant qualifies

- Changing the applicant's place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA's selection policy
- Removing the applicant from the tenant-based voucher waiting list

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

Persons with Disabilities

If an applicant family's head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

18-V.G. OWNER SELECTION OF TENANTS [24 CFR 983.253]

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.

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

HACSD Policy

Policy will be established when conversion projects are determined.

18-V.H. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, the PHA may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

HACSD Policy

Policy will be established when conversion projects are determined.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

The PHA may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, or stalking, except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(c)].

HACSD Policy

Policy will be determined when conversion projects are determined.

Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills
- Caring for a unit and premises
- Respecting the rights of other residents to the peaceful enjoyment of their housing
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others
- Compliance with other essential conditions of tenancy

PART VI: OCCUPANCY

18-VI.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner, and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

18-VI.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter into a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

The tenant and the owner must enter into a written lease agreement that is signed by both parties. The tenancy addendum must include, word-for-word, all provisions required by HUD.

Lease Requirements [24 CFR 983.256(c); Notice PIH 2019-23]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; and
- The amount of any charges for food, furniture, or supportive services.

The PHA must include resident procedural rights for termination notification and grievance procedures in the owner's lease. These requirements are not part of the regular PBV program but are required under RAD.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements
- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide)

All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f); *PBV Quick Reference Guide* 06/20]

Leases for residents who will remain in place (i.e., who will not be relocated solely as a result of conversion) must have an effective date that coincides with—and must be signed on or before—the effective date of the RAD PBV HAP contract.

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g., month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The PHA terminates the HAP contract
- The PHA terminates assistance for the family

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257; Notice PIH 2019-23]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Projects converting from public housing to PBV under RAD have additional procedural rights that do not apply to the standard PBV program. These procedural rights must be included in the owner’s lease as well as the PHA’s administrative plan. In addition to the regulations at 24 CFR 983.257 related to project owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease, which may not be less than:

- A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction
- Not less than 14 days in the case of nonpayment of rent
- Not less than 30 days in any other case, except that if a state or local law provides for a shorter period of time, such shorter period will apply

These provisions apply to non-RAD PBV units located in the project as well.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by PHA policy. According to program requirements, the family's assistance must be terminated if they are absent from the unit for more than 180 consecutive days. PHA termination of assistance actions due to family absence from the unit are subject to 24 CFR 982.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

Continuation of Housing Assistance Payments [24 CFR 983.258; Notice PIH 2019-23]

Current residents living in the property prior to conversion are placed on and remain under the HAP contract when TTP equals or exceeds gross rent. In this case, until such time as the family's TTP falls below the gross rent, the family will pay the owner the lesser of their TTP minus the utility allowance or any applicable maximum rent under the LIHTC program. The family will continue to pay this amount until/if circumstances change, and HAP is paid on their behalf. In other words, assistance may subsequently be reinstated if the tenant becomes eligible for assistance. In such cases, the resident is still considered a program participant. All of the family obligations and protections under RAD and standard PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Any non-RAD PBV units located in the same project are also subject to these requirements.

Unless a waiver is requested and approved, following conversion, 24 CFR 983.53(d) applies, and any new admission referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program. The PHA may request a waiver from HUD in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not paid HAP for the family in 180 days.

Further, for any new families admitted after the conversion, assistance will be terminated 180 days after the last housing assistance payment on their behalf. The cessation of housing assistance payments does not affect the family's other rights under its lease, nor does it preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within the 180-day window. If a family's assistance is terminated as a result of their zero HAP status, the PHA must remove the unit from the HAP contract. If the project is fully assisted, the PHA must reinstate the unit after the family has vacated the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.

HACSD Policy

Policy will be established when conversion projects have been determined.

Security Deposits [24 CFR 983.259; *PBV Quick Reference Guide 10/14*]

Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. Otherwise the security deposit requirements for standard PBV apply.

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

HACSD Policy

Policy will be established when conversion projects are determined.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as

reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

18-VI.C. PUBLIC HOUSING FSS AND ROSS PARTICIPANTS [Notice PIH 2019-23]

Current PH FSS participants will continue to participate in the PHA's FSS program, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the current fiscal year (FY) PH FSS notice of funding availability (NOFA) to serve those FSS participants who live in units converted to RAD and who will as a result be moving to the HCV FSS program. A PHA must convert the PH FSS program participants at the covered project to their HCV FSS program.

Residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding.

Current Resident Opportunities and Self-Sufficiency–Service Coordinators (ROSS–SC) program grantees will be able to finish out their current ROSS–SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS–SC grants.

At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a nonprofit or local resident association and this consequence of a RAD conversion may impact those entities.

Any non-RAD PBV units located in the same project are also subject to these requirements.

18-VI.D. RESIDENT PARTICIPATION AND FUNDING [Notice PIH 2019-23]

Residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

18-VI.E. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260; Notice PIH 2019-23]

All in-place tenants at the time of conversion are eligible to remain in the project. Over-housed families should be moved into appropriately sized units if such units are available in the new or rehabbed project. If appropriately sized units are not available, the existing tenants may continue to be over-housed until an appropriately sized unit becomes available or until the tenant leaves

the project. Once the unit turns over, it must be leased to an appropriately sized family. Any non-RAD PBV units located in the same project are also subject to these requirements.

Following conversion, the standard PBV regulations apply. If the PHA determines that a family is occupying a wrong-size unit, based on the PHA's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the PHA must promptly notify the family and the owner of this determination, and the PHA must offer the family the opportunity to receive continued housing assistance in another unit.

PHA Policy

Policy will be established when conversion projects are determined.

If the PHA offers the family a tenant-based voucher, the PHA must terminate the housing assistance payments for a wrong-size or accessible unit at the earlier of the expiration of the term of the family's voucher, including any extension granted by the PHA, or the date upon which the family vacates the unit. If the family does not move out of the wrong-size unit or accessible unit by the expiration of the term of the family's voucher, the PHA must remove the unit from the HAP contract.

If the PHA offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the PHA and remove the unit from the HAP contract.

HACSD Policy

Policy will be established when conversion projects are determined.

Family Right to Move [24 CFR 983.261]

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.

Choice Mobility [Notice PIH 2019-23]

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 lease 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 a voucher or other comparable tenant-based assistance is not immediately available, 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.

HACSD Policy:

Policy will be established when conversion projected are determined.

Turnover Cap

If as a result of RAD, the total number of PBV units (including RAD PBV units) administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD, the PHA may establish a turnover cap. The PHA is not required to provide more than three-quarters of its turnover vouchers in any single year to the residents of covered projects. If the PHA chooses

to establish a turnover cap and the cap is implemented, the PHA must create and maintain a waiting list in the order requests from eligible households were received.

HACSD Policy

Policy will be established when conversion projects are determined.

Emergency Transfers under VAWA [Notice PIH 2017-08]

Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

HACSD Policy

Policy will be established when conversion projects are determined.18-VI.F.
REEXAMINATIONS [*PBV Quick Reference Guide* 10/14]

A family living in a unit converted from public housing to RAD PBV may retain its certification date. Unless a family's annual reexamination is due at the same time as the effective date of the RAD PBV HAP contract, the PHA does not need to recertify tenants at the point of conversion. For each family residing in a unit undergoing conversion of assistance under RAD, the administering PHA will have to submit a form HUD-50058 reflecting the family's admission to the voucher program. The effective date of the new admission will be the same as the effective date of the RAD PBV HAP contract. The form should include the same information previously found on the public housing form 50058, including the next annual reexamination date.

18-VI.G. EARNED INCOME DISALLOWANCE [Notice PIH 2019-23]

Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR 5.617. Upon the expiration of the EID for such families, the rent adjustment will not be subject to rent phase-in; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. Any non-RAD PBV units located in the same project are also subject to these requirements.

Under the HCV program, the EID exclusion is limited to only persons with disabilities [24 CFR 5.617(b)]. In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only persons with disabilities is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant, such as tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment), tenants that move into the property following conversion, etc., is covered by this waiver.

18-VI.H. RESIDENTS' PROCEDURAL RIGHTS [Notice PIH 2019-23]

HUD is incorporating additional termination notification requirements for public housing projects that convert assistance under RAD to PBV and to non-RAD PBV units located in the same project beyond those for the standard PBV program. In addition to the regulations at 24 CFR 983.257 related to owner termination of tenancy and eviction (which MTW agencies may not alter), the

Chapter 19 - SPECIAL PROGRAMS and SPECIAL PURPOSE VOUCHERS

INTRODUCTION

This chapter contains information about the HACSD's special programs and special purpose vouchers, including any special claims allowed by the program. A family may choose to rent other eligible housing in accordance with the requirements of the specific program.

Special purpose vouchers are specifically funded by Congress as separate appropriations from regular HCV program funding in order to target specific populations. Special purpose vouchers administered by HACSD include vouchers for the following programs:

- Family Unification Program (FUP)
- Veterans Affairs Supportive Housing (VASH)
- Mainstream Voucher Program
- Emergency Housing Voucher (EHV) program

Special Programs are tenant-based rental assistance programs, operated in community partnership, that generally follow the provisions of the Housing Choice Voucher (HCV) program. These grant programs expand opportunities for vulnerable individuals and families to access quality affordable rental homes. Special programs administered by HACSD include:

- Moderate Rehabilitation Program (MOD REHAB)
- Housing Opportunities for People with AIDS (HOPWA)
- HOME Tenant-Based Rental Assistance (TBRA)

This chapter describes HUD regulations and PHA policies for administering special purpose vouchers and other designated special programs. The policies outlined in the chapter are organized into six sections, as follows:

Part I: Mainstream Voucher Program

Part II: Moderate Rehabilitation Program

Part III: HOPWA

Part IV: VASH

Part V: Family Unification Program (FUP)

Part VI: Emergency Housing Voucher (EHV) Program

Part VII: HOME Tenant-Based Rental Assistance (TBRA) Program

Except as addressed by this chapter and as required under federal statute and HUD requirements, the general requirements of the HCV program apply to special purpose and special program vouchers.

PART I: MAINSTREAM VOUCHER PROGRAM
[24 CFR 982]

19-I.A. PROGRAM OVERVIEW [Notice PIH 2020-01]

Mainstream vouchers assist non-elderly persons with disabilities and their families in the form of either project-based or tenant-based voucher assistance.

Aside from separate funding appropriations and serving a specific population, Mainstream vouchers follow the same program requirements as standard vouchers. The PHA does not have special authority to treat families that receive a Mainstream voucher differently from other applicants and participants. For example, the PHA cannot apply different payment standards, establish conditions for allowing portability, or apply different screening criteria to Mainstream families.

Existing families issued Mainstream Vouchers prior to 2019 have different eligibility criteria than 2019 Mainstream vouchers.

Mainstream vouchers that were issued prior to the 2019 Appropriation Act clarification are designated for disabled families (head, spouse, or sole member is disabled).

HACSD assists the families on this program with resource referrals and provides additional assistance to the families to enable them to obtain and retain assisted housing.

Unless otherwise noted, these vouchers are administered in conformance with this Plan.

19-I.B. ELIGIBLE POPULATION [Notice PIH 2020-22]

All Mainstream vouchers must be used to serve non-elderly persons with disabilities and their families, defined as any family that includes a person with disabilities who is at least 18 years old and not yet 62 years old as of the effective date of the initial HAP contract. The eligible disabled household member does not need to be the head of household.

The definition of person with disabilities for purposes of Mainstream vouchers is the statutory definition under section 3(b)(3)(E) of the 1937 Act, which is the same as is used for allowances and deductions in the HCV program and is provided in Exhibit 3-1 of this policy.

Existing families receiving Mainstream vouchers, where the eligible family member is now age 62 or older, will not “age out” of the program as long as the family was eligible on the day it was first assisted under a HAP contract.

The PHA may not implement eligibility screening criteria for Mainstream vouchers that is different from that of the regular HCV program.

19-I.C. PARTNERSHIP AND SUPPORTIVE SERVICES [Notice PIH 2020-01]

PHAs are encouraged but not required to establish formal and informal partnerships with a variety of organizations that assist persons with disabilities to help ensure eligible participants find and maintain stable housing.

HACSD Policy

HACSD will implement a Mainstream program in partnership with the County of San Diego, Health and Human Services Agency, under a special local preference in accordance with Chapter 4-III.C. of this Plan.

Applications may be received from the applicant or on behalf of the applicant by the County of San Diego, Health and Human Services Agency and will be placed on the HCV waitlist as of the date and time of the application or referral.

19-I.D. WAITING LIST ADMINISTRATION

General Waiting List Requirements [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

PHAs must not have a separate waiting list for Mainstream voucher assistance since the PHA is required by the regulations to maintain one waiting list for tenant-based assistance [24 CFR 982.204(f)]. All PHA policies on opening, closing, and updating the waiting list, as well as waiting list preferences in Chapter 4, apply to the Mainstream program.

When the PHA is awarded Mainstream vouchers, these vouchers must be used for new admissions to the PHA's program from the waiting list. The PHA must lease these vouchers by pulling the first Mainstream-eligible family from its tenant-based waiting list. PHAs are not permitted to reassign existing participants to the program in order to make regular tenant-based vouchers available. Further, the PHA may not skip over Mainstream-eligible families on the waiting list because the PHA is serving the required number of Mainstream families.

Upon turnover, vouchers must be provided to Mainstream-eligible families. If a Mainstream turnover voucher becomes available, the PHA must determine if the families at the top of the waiting list qualify under program requirements.

Admission Preferences [Notice PIH 2020-01; FY17 Mainstream Notice of Funding Availability (NOFA); FY19 Mainstream NOFA]

If the PHA claimed points for a preference in a NOFA application for Mainstream vouchers, the PHA must adopt a preference for at least one of the targeted groups identified in the NOFA.

HACSD Policy

HACSD claimed a preference for a targeted group as part of an application for Mainstream vouchers under a NOFA. The PHA will offer the following preference for 138 vouchers (see 4-III.C).

- 1) *Exiting an Institution or Segregated Setting; or***
- 2) *Homeless***

Mainstream vouchers awarded in addition to the 138 initial vouchers are not subject to targeted preferences and will be pulled directly from the HCV waiting list based on the eligible population as indicated in 19-I.B. and the policies outlined in Chapter 4.

Admission Preferences

HACSD applies local preferences in determining the order in which Mainstream Vouchers are awarded to eligible families as referenced in Chapter 4.

DEFINITIONS

If the applicant meets the criteria for special local preference category 4 the following definitions and verification apply:

Institution or Segregated Setting

An institution or segregated setting is defined as a mental institution or hospital setting.

Verification

For verification of institutionalization or other segregated settings, the HACSD will accept a statement from a medical professional who is familiar with the applicant and who can attest that the individual would be able to live on their own if housing assistance and other resources were available.

The individual must have been in residence in the segregated setting for at least 30 days, and has either;

1. Exited within 90 days from the selection date, or;
2. Will exit within 30 days of being selected from the waiting list.

Homeless

Applicants must meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3. at the time of selection.

Verification

For verification of homelessness, the HACSD will accept appropriate documentation listed under 24 CFR 582.301.

Accommodations

Mainstream voucher holders in both programs are provided with resources regarding unit accessibility and any other needs requested in order to fully utilize the program.

Mainstream voucher holders have the same bedroom payment standard as with the HCV program and may request a higher payment standard if needed as a reasonable accommodation to fully utilize the program. See Chapter 2 for reasonable accommodation policies and procedures.

19-I.E. PORTABILITY

[Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

Mainstream voucher participants are eligible for portability under standard portability rules and all PHA policies regarding portability in Chapter 10, Part II apply to Mainstream families.

The following special considerations for Mainstream vouchers apply under portability:

- If the receiving PHA has a Mainstream voucher available, the participant may remain a Mainstream participant.
 - If the receiving PHA chooses to bill the initial PHA, then the voucher will remain a Mainstream voucher.
 - If the receiving PHA chooses to absorb the voucher, the voucher will be considered a regular voucher, or a Mainstream voucher if the receiving PHA has a Mainstream voucher available, and the Mainstream voucher at the initial PHA will be freed up to lease to another Mainstream-eligible family.
- If the receiving PHA does not have a Mainstream voucher available, the participant may receive a regular voucher.

19-I.F. PROJECT-BASING MAINSTREAM VOUCHERS

[FY19 Mainstream Voucher NOFA Q&A]

The PHA may project-base Mainstream vouchers in accordance with all applicable PBV regulations and PHA policies in Chapter 17. PHAs are responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable federal nondiscrimination and civil rights statutes and requirements. This includes, but is not limited to, Section 504 of the Rehabilitation Act (Section 504), Titles II or III of the Americans with Disabilities (ADA), and the Fair Housing Act and their implementing regulations at 24 CFR Part 8; 28 CFR Parts 35 and 36; and 24 CFR Part 100. Mainstream vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A.

3. Broadens the use of “tiered” environmental reviews so that streamlined submissions are needed for certain Part 50 reviews; requires the use of the HUD Environmental Review Online System (HEROS) for Part 50 reviews; and requires radon testing for PBRA and PBV conversions
4. Streamlines the Conversion Plan (Financing Plan) requirements for Mod Rehab Conversion when certain criteria have been met;
5. Creates an ability for Mod Rehab and SRO properties converting to PBRA to utilize contract rents based on the condition of the property following rehabilitation;
6. Provides an ability for owners of converting SRO properties serving the homeless to establish a leasing or occupancy preference that facilitates permanent supportive housing;
7. Fully establishes resident right of return and the prohibition against re-screening for existing residents; and
8. Establishes a final date that any remaining RAP properties may make a submission of conversion under RAD.

This Plan will be updated with additional discretionary policies and project details as Mod-Rehab projects convert to Project-Based Voucher projects.

PART III: HOPWA
[24 CFR 574]

19-III.A. OVERVIEW

The Housing Opportunities for Persons with AIDS (HOPWA) is a federally funded program designed to provide housing assistance and related supportive services for low-income persons living with HIV/AIDS and their families. The HOPWA Tenant-Based Rental Assistance (TBRA) program is one component of an overall continuum of care designed to assist these individuals and is intended to be a temporary program until participants can transition to the regular Section 8 Housing Choice Voucher program.

19-III.B. ADMINISTRATION

HOPWA TBRA is administered by the HACSD with guidance and input from the HIV Housing Committee and the City of San Diego and in accordance with the Section 8 Housing Choice Voucher tenant-based rental assistance regulations set forth in 24 CFR part 982, unless otherwise indicated in this section, or in 24 CFR part 574.

19-III.C. REQUIREMENTS

Waitlist

Participants may reside anywhere in San Diego County. The participants for this program are selected from the HOPWA waiting list based on established priorities and date and time of application. Priority will be given to persons as described in the County of San Diego Housing and Community Development Services' HOPWA Tier Policy as may be amended from time to time.

Eligibility

Eligibility is contingent on the head of household, spouse, or sole member being a person with HIV/AIDS.

The household income must not exceed 80% of the Area Median Income (AMI) for admission and participants are never allowed to pay more than 30% of their monthly adjusted income towards rent.

Criminal Prohibitions

Criminal prohibitions do not apply at admission. Once admitted HOPWA TBRA participants will follow the same requirements as HCV participants regarding criminal violations as outlined in this Plan.

Rent Calculation

In order to keep a participant at or below the 30% maximum rent level, the Fair Market Rent (FMR) established by HUD is used as the payment standard. Additionally, up to 20% of the participants may be allowed a payment standard of 110% of the FMR. Participants are not subject to a minimum rent requirement.

Subsidy Standards

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Inspections

Housing Quality Standards (HQS) inspections will be conducted on all HOPWA TBRA units at initial lease-up and annually thereafter. HOPWA units are not eligible for biennial inspections.

19-III.D. TERMINATIONS

In regard to a surviving member or members of a family who were living in a unit assisted under the HOPWA program with the person with AIDS at the time of their death, housing assistance and supportive services under the HOPWA program shall continue for a grace period of up to a year in the assisted unit while the family transitions off of the program. The assistance will be terminated at either the end of the grace period or upon move-out of the assisted unit if the household moves prior to the end of the grace period.

PART IV: VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH)
[24 CFR 982]

19-IV.A. OVERVIEW

Since 2008, HCV program funding has provided rental assistance under a supportive housing program for homeless veterans. The Veterans Affairs Supportive Housing (VASH) program combines HCV rental assistance with case management and clinical services provided by the Department of Veterans Affairs (VA) at VA medical centers (VAMCs) and Community-Based Outpatient Clinics (CBOCs), or through a designated service provider (DSP) as approved by the VA Secretary. Eligible families are homeless veterans and their families that agree to participate in VA case management and are referred to the VAMC's partner PHA for HCV assistance. The VAMC or DSP responsibilities include:

- Screening homeless veterans to determine whether they meet VASH program participation criteria;
- Referring homeless veterans to the PHA;
- The term homeless veteran means a veteran who is homeless (as that term is defined in subsection (a) or (b) of Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)). See 38 U.S.C. 2002.
- Providing appropriate treatment and supportive services to potential VASH participants, if needed, prior to PHA issuance of a voucher;
- Providing housing search assistance to VASH participants;
- Identifying the social service and medical needs of VASH participants, and providing or ensuring the provision of regular ongoing case management, outpatient health services, hospitalization, and other supportive services as needed throughout the veterans' participation period; and
- Maintaining records and providing information for evaluation purposes, as required by HUD and the VA.

Generally, the HUD-VASH program is administered in accordance with regular HCV program requirements. However, HUD is authorized to waive or specify alternative requirements to allow PHAs to effectively deliver and administer VASH assistance. Alternative requirements are established in the HUD-VASH Operating Requirements, which were originally published in the Federal Register on May 6, 2008, and updated September 27, 2021. Unless expressly waived by HUD, all regulatory requirements and HUD directives regarding the HCV program are applicable to VASH vouchers, including the use of all HUD-required contracts and other forms, and all civil rights and fair housing requirements. In addition, the PHA may request additional statutory or regulatory waivers that it determines are necessary for the effective delivery and administration of the program.

On October 25, 2023, HUD approved waivers and alternative requirements for income, assets, and other documentation at admission. The waivers and alternative requirements are documented below.

The VASH program is administered in accordance with applicable Fair Housing requirements since civil rights requirements cannot be waived under the program. These include applicable authorities under 24 CFR 5.105(a) and 24 CFR 982.53 including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964,

the Americans with Disabilities Act, and the Age Discrimination Act and all PHA policies as outlined in Chapter 2 of this document.

When HUD-VASH recipients include veterans with disabilities or family members with disabilities, reasonable accommodation requirements in Part II of Chapter 2 of this policy apply.

19-IV.B. REFERRALS [FR Notice 9/27/21 and HUD-VASH Qs and As]

VAMC case managers will screen all families in accordance with VA screening criteria and refer eligible families to the PHA for determination of program eligibility and voucher issuance. The PHA has no role in determining or verifying the veteran's eligibility under VA screening criteria, including determining the veteran's homelessness status. The PHA must accept referrals from the partnering VAMC and must maintain written documentation of referrals in VASH tenant files. Upon turnover, VASH vouchers must be issued to eligible veteran families as identified by the VAMC.

HACSD Policy

In order to expedite the screening process, HACSD will provide all forms and a list of documents required for the VASH application to the VAMC. Case managers will work with veterans to fill out the forms and compile all documents prior to submitting an application to HACSD. After the VAMC has given HACSD a complete referral, HACSD will perform an eligibility screening.

19-IV.C. HCV PROGRAM ELIGIBILITY [FR Notice 9/27/21]

Eligible participants are homeless veterans and their families who agree to participate in case management from the VAMC.

- A VASH Veteran or veteran family refers to either a single veteran or a veteran with a household composed of two or more related persons. It also includes one or more eligible persons living with the veteran who are determined to be important to the veteran's care or well-being.
- A veteran for the purpose of VASH is a person whose length of service meets statutory requirements, and who served in the active military, naval, or air service, was discharged or released under conditions other than dishonorable, and is eligible for VA health care.

Under VASH, PHAs do not have authority to determine family eligibility in accordance with HCV program rules and PHA policies. The only reasons for denial of assistance by the PHA are failure to meet the income eligibility requirements and/or that a family member is subject to a lifetime registration requirement under a state sex offender registration program. Under portability, the receiving PHA must also comply with these VASH screening requirements.

Social Security Numbers

When verifying Social Security numbers (SSNs) for homeless veterans and their family members, an original document issued by a federal or state government agency, which contains the name and SSN of the individual along with other identifying information of the individual, is acceptable in accordance with Section 7-II.B. of this policy.

In the case of the homeless veteran, the PHA must accept the Certificate of Release or Discharge from Active Duty (DD-214) or the VA-verified Application for Health Benefits (10-10EZ) as verification of SSN and cannot require the veteran to provide a Social Security card. A VA-issued identification card may also be used to verify the SSN of a homeless veteran.

HACSD Policy

In accordance with HUD approved waiver, HACSD may accept a self-certification of a family member's SSN and a third-party document with the applicant's name printed on it to satisfy this requirement, provided that the PHA first asks for the required documentation. Additionally, there is no requirement that the document be dated within a certain time frame.

If the HACSD uses this option, they must document in the tenant file why self-certification was used. HACSD must review the *Failed Social Security Administration (SSA) Identify Report* to identify participants whose identity is not verified. If after 120 days, the participant's SSN is verified in EIV, no further verification is required.

If the participant's SSN is not verified in EIV, the family must provide documentation as required under 24 CFR 5.216(g)(i). If the participant does not provide documentation of SSN nor is verified in EIV, the HACSD must terminate the case in accordance with termination policy found at 12-I.D.

Proof of Age

The DD-214 or 10-10EZ must be accepted as proof of age in lieu of birth certificates or other PHA-required documentation as outlined in Section 7-II.C. of this policy. A VA-issued identification card may also be used to verify the age of a homeless veteran.

HACSD Policy

In accordance with HUD approved waiver of 24 CFR 982.201(e), HACSD may accept self-certification of date of birth and obtain higher level documentation within 90 days of admission or upon verification of information in EIV with respect to verifying the family's elderly status and the impact that determination has on the family's eligible expenses and deductions.

Photo Identification

A VA-issued identification card must be accepted in lieu of another type of government-issued photo identification. These cards also serve as verification of SSNs and date of birth.

Income Eligibility

The PHA must determine income eligibility for VASH families in accordance with 24 CFR 982.201 and policies in Section 3-II.A. If the family is over-income based on the most recently published income limits for the family size, the family will be ineligible for HCV assistance.

While income-targeting does not apply to VASH vouchers, the PHA may include the admission of extremely low-income VASH families in its income targeting numbers for the fiscal year in which these families are admitted.

HACSD Policy

Income-targeting requirements of section 16(b) of the 1937 Act, as well as 24 CFR 982.201(b)(2), do not apply for HUD-VASH families. The HACSD will serve homeless veterans at a variety of income levels, including extremely low (30% AMI) very low (50% AMI), and low-income (80% AMI).

While income-targeting requirements will not be considered by HACSD when families are referred by the partnering VAMC, HACSD will include any extremely low-income VASH families that are admitted in its income targeting numbers for the fiscal year in which these families are admitted.

PART V: FAMILY UNIFICATION PROGRAM (FUP)

19-V.A. PROGRAM OVERVIEW [Fact Sheet, Housing Choice Voucher Program Family Unification Program (FUP)]

Overview

The Family Unification Program (FUP) was authorized by Congress in 1990 to help preserve and reunify families. PHAs that administer the program provide vouchers to two different populations—FUP families and FUP youth.

Families eligible for FUP are families for whom the lack of adequate housing is a primary factor in:

- The imminent placement of the family's child or children in out-of-home care; or
- The delay in the discharge of the child or children to the family from out-of-home care.

There is no time limitation on FUP family vouchers, and the family retains their voucher as long as they are HCV-eligible. There is no requirement for the provision of supportive services for FUP family vouchers.

Youth eligible for FUP are those who:

- Are at least 18 years old and not more than 24 years of age;
- Have left foster care or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 and older; and
- Are homeless or at risk of becoming homeless.

FUP youth vouchers are limited by statute to a period between 36 and 60 months of housing assistance. Supportive services must also be provided to FUP-eligible youth by the Public Child Welfare Agency (PCWA) or by another agency or organization under contract with the PCWA for the period of time defined in the Notice of funding Availability/Opportunity (NOFA/O) for which funding was made available.

PHAs that wish to administer FUP vouchers must apply to HUD by submitting an application under an active Notice of Funding Opportunity (NOFO). While the FUP program is administered in accordance with HCV regulations, the FUP NOFOs issued by HUD provide specific program information and requirements.

In order to administer the program, the PHA must also form a partnership with a local PCWA who is responsible for determining the family or youth meets FUP eligibility requirements and referring them to the PHA. Once the referral is received, the PHA is responsible for placing the FUP family or youth on the PHA's waiting list and determining whether they are eligible to receive assistance under the PHA's HCV program.

Assigning Vouchers [FUP FAQs]

The PHA may, but is not required to, assign a specific number or percentage of FUP vouchers for FUP youths and FUP families. Unless the PHA assigns a specific number or percentage of FUP vouchers to a designated FUP population, the PHA must serve any referrals (youths or families) that meet all program eligibility requirements up to the PHA's designated FUP program size.

HACSD Policy

HACSD has not designated any specific number or percentage of FUP vouchers for youths or families. HACSD will serve all referrals that meet program eligibility requirements, up to the PHA's FUP voucher allocation. HACSD administers 37 FUP vouchers which will be prioritized and allocated between the two programs, as determined by the PCWA.

19-V.B. PUBLIC CHILD WELFARE AGENCY (PCWA)

Families and youth do not apply directly to the PHA for FUP vouchers. They are instead referred by a PCWA with whom the PHA has entered into a Memorandum of Understanding (MOU). The partnering PCWA initially determines whether the family or youth meets the FUP program eligibility requirements listed in 19-V.C. and 19-V.D. and then refers those families or youths to the PHA.

HUD strongly encourages PHAs and PCWAs to make decisions collaboratively on the administration of the program and to maintain open and continuous communication. The PCWA must have a system for identifying FUP-eligible youth within the agency's caseload and for reviewing referrals from a Continuum of Care (COC) if applicable.

HACSD Policy

HACSD has entered into an MOA with the following partnering organizations:

County of San Diego HHSA's Child Welfare Services (CWS)

Regional Task Force on Homelessness (RTFH)

Supportive Services

The PCWA must provide supportive services for the period of time defined in the notice or NOFA/O for which the funding was made available to all FUP-eligible youth regardless of their age. The MOU between the PHA and the PCWA should identify the period of time in which supportive services will be provided.

HACSD Policy

CWS will provide or secure supportive services for all FUP youth for a period of 36 months.

Supportive services may be provided to FUP-eligible youth by the PCWA or by another agency or organization under agreement or contract with the PCWA, including the PHA. The organization providing the services and resources must be identified in the MOU. The following services must be offered:

- Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation; and access to health care (e.g., doctors, medication, and mental and behavioral health services);
- Counseling on compliance with rental lease requirements and with HCV program participant requirements, including assistance or referrals for assistance on security deposits, utility hook-up fees, and utility deposits;
- Providing such assurances to owners of rental property as are reasonable and necessary to

assist an FUP-eligible youth to rent a unit with an FUP voucher;

- Job preparation and attainment counseling (where to look/how to apply, dress, grooming, relationships with supervisory personnel, etc.); and
- Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); or attendance or financing of education at a technical school, trade school, or college, including successful work ethic and attitude models.

HACSD Policy

Additional supportive services will not be offered.

A FUP-eligible youth cannot be required to participate in these services as a condition of receipt of the FUP voucher.

19-V.C. FUP FAMILY VOUCHER ELIGIBILITY CRITERIA

FUP family assistance is reserved for eligible families that the PCWA has certified are a family for whom a lack of adequate housing is a primary factor in:

- The imminent placement of the family's child or children in out-of-home care, or
- The delay in the discharge of the family's child or children to the family from out-of-home care.

Lack of adequate housing means the family meets any one of the following conditions:

- Living in substandard housing, which refers to a unit that meets any one of the following conditions:
 - Does not have operable indoor plumbing
 - Does not have a usable flush toilet inside the unit for the exclusive use of a family or youth
 - Does not have a usable bathtub or shower inside the unit for the exclusive use of a family or youth
 - Does not have electricity, or has inadequate or unsafe electrical service
 - Does not have a safe or adequate source of heat
 - Should, but does not, have a kitchen
 - Has been declared unfit for habitation by an agency or unit of government, or in its present condition otherwise endangers the health, safety, or well-being of the family or youth
 - Has one or more critical defects, or a combination of intermediate defects in sufficient number or to the extent that it requires considerable repair or rebuilding. The defects may result from original construction, from continued neglect or lack of repair, or from serious damage to the structure
- **Being homeless as defined in 24 CFR 578.3**
- Living in a unit where the presence of a household member with certain characteristics (i.e., conviction for certain criminal activities) would result in the imminent placement of the family's

child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care

- Living in housing not accessible to the family's disabled child or children due to the nature of the disability
- Living in an overcrowded unit, which is defined as living in a unit where one of the following conditions has been met:
 - The family is separated from its child or children and the parents are living in an otherwise standard housing unit, but, after the family is reunited, the parents' housing unit would be overcrowded for the entire family and would be considered substandard; or
 - The family is living with its child or children in a unit that is overcrowded for the entire family and this overcrowded condition may result, in addition to other factors, in the imminent placement of its child or children in out-of-home care.
 - For purposes of this definition, the determination as to whether the unit is overcrowded is made in accordance with the PHA subsidy standards in Chapter 5, Part III of this policy.

Since HUD does not define imminent placement, the partnering PCWA may use its discretion to determine whether the potential out of home placement of the family's child or children is imminent [FUP FAQs]

19-V.D. FUP YOUTH VOUCHER ELIGIBILITY CRITERIA

While FUP family vouchers operate as regular HCVs after the family is referred from the PCWA, there are several aspects of the FUP youth vouchers that make them distinct from the FUP family vouchers and from regular HCVs.

Eligibility Criteria

A FUP-eligible youth is a youth the PCWA has certified:

- Is at least 18 years old and not more than 24 years of age (has not yet reached their 25th birthday);
 - The FUP youth must be no more than 24 years old at the time the PCWA certifies them as eligible and at the time of HAP contract execution.
- Has left foster care or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act;
 - Foster care placement can include, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, childcare institutions, and pre-adoptive homes in accordance with 24 CFR 5.576.
- **Is homeless or at risk of becoming homeless at age 16 or older;**
 - **At risk of being homeless** is fully defined at 24 CFR 576.2.

o This includes a person that is exiting a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution).

o Therefore, youth being discharged from an institution may be eligible for a FUP voucher [FUP FAQs].

- Has an annual income at or below 50 percent of area median income*; and
- Does not have sufficient resources or support networks (e.g., family, friends, faith-based or other social networks) immediately available to prevent them from moving to a supervised publicly or privately operated shelter designed to provide temporary living arrangements.

*PHA must provide 75 percent of its vouchers to applicants whose incomes do not exceed 30 percent of the area median income (AMI). Applicants qualifying under the 'at risk of being homeless' category, by definition, have incomes at or below 30 percent (AMI). 19-V.E. Assistance Period [FR Notice 1/24/22]

Although there is no time limit on FUP family vouchers, FUP youth vouchers are limited by statute. Unless the FUP youth meets an exception outlined below, after 36 months of assistance, the FUP youth voucher must be terminated. However, any period of time for which no subsidy (HAP) is being paid on behalf of the youth does not count toward the 36-month limitation.

If the FUP youth does meet the requirements outlined below, the statutory limit on FUP assistance is a total of 60 months of FUP voucher assistance [FR Notice 1/24/22].

Extension of Assistance

FUP youth who first leased or lease a unit after December 27, 2020, may be eligible for an extension of assistance up to 24 months beyond the 36-month time limit (for a total of 60 months of assistance).

While FUP youth cannot be required to participate in the Family Self-Sufficiency (FSS) program as a condition of receipt of assistance, an eligible youth who participates in the FSS program and is in compliance with the applicable terms and conditions of the program is entitled to receive assistance for up to an additional 24 months. A FUP youth must accept an FSS slot if it is offered to them prior to the 36-month mark in order to receive an extension of assistance (unless the youth meets one of the statutory exceptions described below).

Statutory Exceptions

A FUP youth will be entitled to receive an extension of assistance for up to 24 months beyond the 36-month time limit without participating in the PHA's FSS program if they certify that they meet one of the exceptions below:

- The FUP youth is a parent or other household member responsible for the care of a dependent child under the age of six or for the care of an incapacitated person.

HACSD Policy

Under guidance of state and local law, HACSD defines *incapacitated person* as someone who lacks the ability to make certain types of decisions or take certain types of actions when at least one of the mental functions referenced in CA Prob. Code 810-13 (2017) is impaired or lacking. This includes the failure to understand and appreciate the consequences of their actions.

The FUP youth will be required to self-certify that they meet this exception.

The child or incapacitated person is not required to reside in the household in order for the youth to certify they meet this exception. For example, a child in a joint custody arrangement under the age of six who resides in the household only part-time may qualify the youth for this exception.

- The FUP youth is a person who is regularly and actively participating in a drug addiction or alcohol treatment and rehabilitation program.

HACSD Policy

Regular and active participation is defined as currently enrolled in, or a graduate of, a certified program who is attending meetings on an ongoing basis.

FUP youth will be required to self-certify that that they meet this exception and provide verification of program participation.

- The FUP youth is a person who is incapable of complying with the requirement to participate in a FSS program as described above or engage in education, workforce development, or employment activities as described below, as applicable, due to a documented medical condition.

HACSD Policy

The FUP youth will be required to self-certify that they meet this exception on a PHA-provided form. A third-party professional verification may be requested specifying period of limitation.

A FUP youth that meets one of the above exceptions must still be offered an opportunity to enroll in the PHA's FSS program (if it is available to them) and receive any supportive services available to FUP youth. A FUP youth may choose to participate in an FSS program or engage in education, workforce development, or employment activities, even if they meet one of the above statutory exceptions.

Education, Workforce Development, or Employment Activities

If a PHA that carries out an FSS program is unable to offer a FUP youth and FSS slot during their first 36 months of receiving FUP youth assistance, the youth is considered to have been "unable to enroll" in the program and may have their voucher extended by meeting the education, workforce development, or employment criteria described below:

- The youth was engaged in obtaining a recognized postsecondary credential or a secondary school diploma or its recognized equivalent.

HACSD Policy

HACSD uses the Workforce Innovation and Opportunity Act (WIOA) to define *recognized post-secondary credential* as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state involved or federal government, or an associate or baccalaureate degree (29 U.S.C. 3102).

Secondary school diploma or its recognized equivalent signifies that a student has completed the requirement for a high school education.

- The youth was enrolled in an *institution of higher education* or a *postsecondary vocational institution* under section 101(a) of the Higher Education Act of 1965 (20 U.S.C. 1001(a)) or an institution that meets the definition of a *proprietary institution of higher education* or a *postsecondary vocational institution* under sections 102(b)(1) and (c)(1) of the Higher Education Act of 1965 (20 U.S.C. 1002(b)(1) and (c)(1), respectively).

HACSD Policy

Youth must be enrolled in education activities on a least a half-time basis, as defined by the institution they attend. However, HACSD may make exceptions to this requirement if the youth is unable to enroll in a sufficient number of classes due to a lack of course offering by the educational institution where the youth is enrolled.

- The youth was participating in a career pathway, as such term is defined in Section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).
- The youth was employed.

HACSD Policy

HACSD will consider the youth to be employed if they work a minimum of 20 hours per week. HACSD may make exceptions to this requirement if the youth's hours are reduced due to circumstances beyond their control or the youth must temporarily reduce their work hours due to a verified emergency.

FSS Enrollment at 24 Months

If the FUP youth has not been provided an opportunity to enroll in the FSS program during the first 24 months of FUP assistance, HUD encourages the PHA to remind the youth at the 24-month reexamination of the education, workforce development, and employment requirements described above so that the youth has enough time to meet these requirements prior to the expiration of the 36-month time period for FUP assistance.

HACSD Policy

If the FUP youth has not been provided an opportunity to enroll in the FSS program during the first 24 months of FUP assistance, HACSD will remind the youth at their second regular reexam of the education, workforce development, and employment requirements described above.

FSS Enrollment Between 36 and 48 Months

If an FSS slot becomes available between the 36-month and 48-month mark:

The PHA must offer the slot to a FUP youth who had their voucher extended based on meeting the education, workforce development, or employment requirement listed above, or one of the statutory exceptions listed above (even if the youth previously declined an FSS slot because they met one of the statutory exceptions).

The PHA must work with the youth to determine whether enrollment in FSS is feasible and in the best interest given any education, workforce development, or employment activities that the youth is engaged in and any statutory exceptions that apply to the youth, as well as the remaining time on their voucher.

If the FUP youth accepts the FSS slot, the PHA must work with the youth to establish Contract of Participation goals and an Individual Training and Services Plan (ITSP) that can be accomplished within the time period left on the voucher.

If the FUP youth is offered an FSS slot prior to the 36-month mark, the youth:

Will be required to enroll in the FSS program in order to receive an extension of assistance at the end of the 36-month time period (unless they meet one of the statutory exceptions described above).

Will not be considered to have been “unable to enroll” in the FSS program as described above, and as a result, will not be eligible to receive an extension of assistance based on meeting the education, workforce development, or employment requirements described above.

FSS Enrollment After 48 Months

The PHA may, but is not required to, offer a FUP youth an FSS slot that becomes available between the 48-month mark and the 60-month mark, since the youth will have already received their second and final extension.

HACSD Policy

If an FSS slot becomes available between the 48 and 60-month marks, HACSD will not offer the FSS slot to a FUP youth.

Periodic Extensions of Assistance

At the 36-month and 48-month reexamination, the PHA must extend FUP youth assistance if the youth is participating in and in compliance with the FSS program as long as the youth is still eligible for the HCV program.

In any case, the FUP youth cannot receive more than a total of 60 months of FUP youth voucher assistance, even if the FSS Contract of Participation time extends beyond the voucher 60-month mark.

No FSS Program or Unable to Enroll in FSS

If a PHA does not carry out an FSS program or the FUP youth has been unable to enroll in the program during the first 36 months of receiving FUP assistance, the FUP youth is entitled to receive an extension of assistance for up to two successive 12-month periods beyond the 36-month time limit provided that the youth engaged in at least one of the education, workforce development, or employment activities described above for not less than nine months of the 12-month period preceding each extension. In order to meet the nine months out of the preceding 12 months requirement, the youth may have engaged in one of the education, workforce development, or employment activities described above or a combination of these activities.

Verification Prior to Annual Exam

In order to provide an extension of assistance, the PHA must verify compliance with the above requirements at the end of the 36-month time period and the 48-month time periods. The PHA does not need to verify compliance with these requirements at the end of the 60-month time period since the maximum length of assistance is 60 months.

To verify compliance with the education, workforce development, or employment requirement or one of the statutory exceptions, the PHA must provide the FUP youth written notification informing them that they may demonstrate that they meet one of these conditions. This notification must be provided sufficiently in advance of the end of the 36-month or 48-month time periods, as applicable, to allow the FUP youth to demonstrate that they meet the condition or exception and for the PHA to conduct an annual reexamination prior to the expiration of the FUP assistance.

HACSD Policy

HACSD will verify compliance with the education, workforce development, or employment requirement, or one of the statutory exceptions, at the end of the 36-month

and 48-month time periods prior to the FUP youth's scheduled annual reexamination. HACSD will not verify compliance at the end of the 60-month time period.

HACSD will provide each FUP youth on the PHA's program with written notification informing them that they may receive an extension of their FUP assistance if they meet conditions outlined in this chapter and providing them with instructions on how they may demonstrate compliance at least 60 days prior to their scheduled annual reexam date.

When necessary, the PHA will provide this notification in a format accessible to FUP youth with disabilities and in a translated format for FUP youth with limited English proficiency in accordance with Chapter 2.

HACSD will use the following verification methods to verify a FUP youth's eligibility for voucher extensions:

To verify compliance with the FSS requirement, HACSD will examine its records to confirm, or obtain confirmation from FSS program staff, that the FUP youth participant is in compliance with FSS program requirements and has not been terminated from the FSS program.

To meet the education, workforce development, or employment requirement, HACSD will verify that the FUP youth was engaged in at least one education, workforce development, or employment activity for at least nine months of the 12-month period immediately preceding the end of the 36-month or 48-month time period, as applicable.

If the youth can demonstrate they will have met the requirement by the end of the time period, they will be considered to have met the requirement.

To meet one of the statutory exceptions describe above, the youth must submit a certification to HACSD that they meet one these exceptions.

A FUP youth who received an extension of voucher assistance at the end of the 36-month time period based on meeting one of the conditions described in this chapter does not have to meet the same conditions when they reach the end of the 48-month time period. The FUP youth may demonstrate that they meet a different condition to receive an extension of their assistance.

If the PHA determines that the youth meets one of the statutory conditions, the PHA would then conduct an annual reexamination. If the annual reexamination determines that the youth is still eligible for the HCV program, the PHA must provide the FUP youth the extension of voucher assistance.

Termination of Assistance for Failure to Meet Conditions

Failure of the FUP youth to meet one of the above conditions will only impact their ability to receive subsequent extensions of assistance. It will not serve as a basis for terminating the FUP assistance prior to the annual reexam.

If the FUP youth does not meet any of the conditions described in this chapter, the youth is subject to the statutory time limit of 36 months or the time limit of any extension that the youth has already received, and the FUP youth voucher must be terminated once the youth reaches this time limit. The calculation of the time limit begins from the date the first HAP contract is signed (for tenant-based vouchers) or from the date the youth entered into the initial lease agreement (for project-based vouchers). The number of months is calculated based on the number of months that HAP subsidy is paid on behalf of the youth, not the number of months that the youth is in the FUP youth program. Prior to termination, the PHA must offer the FUP youth the opportunity to request an informal hearing, in accordance with Chapter 16.

19-V-F. REFERRALS AND WAITING LIST MANAGEMENT

Referrals

The PCWA must establish and implement a system to identify FUP-eligible families and youths within the agency's caseload and make referrals to the PHA. The PCWA must certify that the FUP applicants they refer to the PHA meet FUP eligibility requirements. The PHA is not required to maintain full documentation that demonstrates the family's or youth's FUP eligibility as determined by the PCWA but should keep the referral or certification from the PCWA.

HACSD Policy

As part of the MOA, HACSD and CWS have identified staff positions to serve as lead FUP liaisons. These positions will be responsible for transmission and acceptance of FUP referrals. CWS must commit sufficient staff and resources to ensure eligible families and youths are identified and determined eligible in a timely manner.

When FUP vouchers are available, the HACSD liaison responsible for acceptance of referrals will contact the CWS FUP liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. CWS liaison will provide the PHA with a list of eligible referrals include the name, address, and contact phone number for each adult individual who is being referred; a completed release form for each adult family member; and a written certification for each referral indicating the youth or family is FUP-eligible.

HACSD will maintain a copy of the referral or certification from CWS in the participant's file along with other eligibility paperwork.

A PHA must serve any referrals (youths or families) that meet all program eligibility requirements. If a PHA determines that it has received a sufficient number of referrals from the PCWA so that the PHA will be able to lease all FUP vouchers awarded, the PHA may request that the PCWA suspend transmission of referrals. If the PHA determines that additional referrals will be needed after it has made such a request, the PHA may request that the PCWA resume transmission of referrals [Notice PIH 2011-52]

Waiting List Placement

A family that is already participating in the regular HCV program cannot be transferred to an FUP voucher.

Once a referral is made, the PHA must compare the list of PCWA referrals to its HCV waiting list to determine if any applicants on the PCWA's referral list are already on the PHA's HCV waiting list. Applicants already on the PHA's HCV waiting list retain the order of their position on the list. Applicants not already on the PHA's HCV waiting list must be placed on the HCV waiting list.

If the PHA's HCV waiting list is closed, the PHA must open its HCV waiting list in order to accept new FUP applicants. If necessary, the PHA may open its waiting list solely for FUP applicants, but this information must be included in the PHA's notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).

HACSD Policy

When a referral is received from CWS, HACSD will review the HCV waiting list and will send CWS a list confirming whether or not referrals are on the waiting list.

Referrals who are already on the list will retain their position and the list will be notated to indicate the family or youth is FUP-eligible.

For those referrals not already on the waiting list, HACSD will work with CWS to ensure they receive and successfully complete a pre-application or application, as applicable. Once the pre-application or application has been completed, HACSD will place the referral on the HCV waiting list with the date and time of the original referral and an indication that the referral is FUP-eligible.

Waiting List Selection

The PHA selects FUP-eligible families or youths based on the PHA's regular HCV waiting list selection policies in Chapter 4, including any preferences that may apply.

19-V.G. PHA HCV ELIGIBILITY DETERMINATION

Once a FUP-eligible family or youth is selected from the HCV waiting list, the PHA must determine whether the family or youth meets HCV program eligibility requirements. Applicants must be eligible under both FUP family or youth eligibility requirements, as applicable, and HCV eligibility requirements as outlined in Chapter 3 of this policy.

The PCWA may, but is not obligated to, provide information to the PHA on the family's criminal history.

HACSD Policy

HACSD will pull a criminal history for all adults at the time of initial eligibility.

HACSD will consider the information in making its eligibility determination in accordance with the PHA's policies in Chapter 3, Part III.

Additional FUP Eligibility Factors [FUP FAQs]

For FUP family vouchers, the family must remain FUP-eligible through lease-up.

- If, after a family is referred by the PCWA but prior to issuing a family FUP voucher, the PHA discovers that the lack of adequate housing is no longer a primary factor for the family not reunifying, the FUP voucher may not be issued to the family.
- Similarly, if the FUP voucher has already been issued before the PHA discovers that the reunification will not happen, but the family has not yet leased up under the voucher, the PHA must not execute the HAP contract, as the family is no longer FUP-eligible.

FUP-eligible youth must be no more than 24 years old both at the time of PCWA certification and at the time of the HAP execution. If a FUP youth is 24 at the time of PCWA certification but will turn 25 before the HAP contract is executed, the youth is no longer eligible for a FUP youth voucher.

HACSD Policy

Any applicant that does not meet the eligibility criteria for the HCV program listed in Chapter 3 or any eligibility criteria listed in this section will be notified by the PHA in writing following policies in Section 3-III.F., including stating the reasons the applicant was found ineligible and providing an opportunity for an informal review.

19-V.H. LEASE UP [FR Notice 1/24/22]

Once the PHA determines that the family or youth meets HCV eligibility requirements, the family or youth will be issued a FUP voucher in accordance with PHA policies.

During the family briefing, PHAs must inform the FUP youth of:

- The extension of assistance provisions and requirements;
- The availability of the FSS program and offer them an FSS slot, if available, or offer to place them on the FSS waiting list; and
- Supportive services available to them, the existence of any other programs or services, and their eligibility for such programs and services. However, participation in supportive services cannot be required as a condition of receiving FUP youth assistance.

HACSD Policy

Eligible applicants will be notified by the PHA in writing following policies in Section 3-III.F. of this administrative plan. FUP families will attend a standard HCV briefing in accordance with PHA policies in Part I of Chapter 5 of this administrative plan. FUP youth will be briefed individually. The PHA will provide all aspects of the written and oral briefing as outlined in Part I of Chapter 5 but will also provide an explanation of the required items listed above, as well as discussing supportive services offered by the PCWA.

For both FUP youth and FUP families, vouchers will be issued in accordance with PHA policies in Chapter 5 Part II.

Upon CWS verification of minor children who will be returned to the FUP household, the bedroom size voucher to be issued to the household will be based on the number of family members that include the minor children being returned.

Once the family or youth locate a unit, the PHA conducts all other processes relating to voucher issuance and administration per HCV program regulations and the PHA's policies (including, but not limited to: HQS inspection, determination of rent reasonableness, etc.).

19-V.I. TERMINATION OF ASSISTANCE

General Requirements

Except for terminations of assistance for FUP youth after the statutorily required time period, terminations of FUP assistance are handled in the same way as the regular HCV program. Termination of a FUP voucher must be consistent with regulations for termination in 24 CFR Part 982, Subpart L and be in compliance with PHA policies (Chapter 12).

If the person who qualifies for the FUP voucher passes away, the family retains the FUP voucher. In the case of a FUP-youth voucher, assistance will terminate after the statutorily required time period, even if the FUP-eligible youth is no longer included in the household.

If the person who qualifies for the FUP voucher moves, the remaining family members may keep the FUP voucher based on PHA policy (see administrative plan, Section 3-I.C., Family Breakup and Remaining Member of Tenant Family).

FUP Family Vouchers

If parents lose their parental rights or are separated from their children after voucher lease-up (or their children reach adulthood), the family is still eligible to keep their FUP assistance, as the regulations do not permit HCV termination for a family losing parental rights or the children reaching adulthood. However, the PHA may transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household.

HACSD Policy

HACSD will transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household and there is no prospect of any minor child being returned to the household.

If HACSD has no regular HCV vouchers available at the time this determination is made, including if no vouchers are available due to lack of funding, the PHA will issue the family the next available regular HCV voucher after those being issued to families residing in PBV units claiming Choice Mobility.

FUP Youth Vouchers

A PHA cannot terminate a FUP youth's assistance for noncompliance with PCWA case management, nor may the PHA terminate assistance for an FUP youth for not accepting services from the PCWA.

The PHA may not transfer the assistance of a FUP youth voucher holder to regular HCV assistance upon the expiration of the statutorily required time period. However, the PHA may issue a regular HCV to FUP youth if they were selected from the waiting list in accordance with PHA policies and may also adopt a preference for FUP youth voucher holders who are being terminated for this reason.

HACSD Policy

HACSD will not provide a selection preference on the PHA's HCV waiting list for FUP youth who are terminated due to the time limit on assistance.

Upon the expiration of the statutorily required time period, a FUP youth voucher holder who has children and who lacks adequate housing may qualify for a FUP family voucher provided they are referred by the PCWA as an eligible family and meet the eligibility requirements for the PHA's HCV program.

19-V.J. FUP PORTABILITY

Portability for a FUP family or youth is handled in the same way as for a regular HCV family. A PHA may not restrict or deny portability for a FUP family or youth for reasons other than those specified in the HCV program regulations, as reflected in Chapter 10 of the administrative plan.

A FUP family or youth does not have to port to a jurisdiction that administers FUP.

If the receiving PHA administers the FUP voucher on behalf of the initial PHA, the voucher is still considered a FUP voucher regardless of whether the receiving PHA has a FUP program.

If the receiving PHA absorbs the voucher, the receiving PHA may absorb the incoming port into its FUP program (if it has one) or into its regular HCV program (if the receiving PHA has vouchers available to do so) and the family or youth become regular HCV participants. In either case, when the receiving PHA absorbs the voucher, a FUP voucher becomes available to the initial PHA.

Considerations for FUP Youth Vouchers

If the voucher is a FUP youth voucher and remains such upon lease-up in the receiving PHA's jurisdiction, termination of assistance must still take place once the youth has received assistance for the statutorily required time period. Any time period during which no subsidy was paid on behalf of the youth does not count under the time limit. If the receiving PHA is administering the FUP youth voucher on behalf of the initial PHA, the two PHAs must work together to initiate termination upon expiration of the statutorily required time period.

19-V.K. PROJECT-BASING FUP VOUCHERS [Notice PIH 2017-21; FR Notice 1/24/22]

The PHA may project-base FUP vouchers without HUD approval in accordance with Notice PIH 2017-21, FR Notice 1/24/22, and all statutory and regulatory requirements for the PBV program. Project-based FUP vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A.

The PHA may limit PBVs to one category of FUP-eligible participants (families or youth) or a combination of the two.

While FUP vouchers can be used for either families or youth, a PBV unit may only be counted towards the PHA's 10 percent exception authority under the program cap and the project's income-mixing requirement if the FUP PBV assistance is provided on behalf of an eligible youth. The PHA must amend its administrative plan to include the limitation of these FUP PBV units to eligible youth.

HACSD Policy

HACSD will not project-base FUP vouchers. All FUP vouchers will be used to provide tenant-based assistance.

PART VI: EMERGENCY HOUSING VOUCHER (EHV) PROGRAM

19-VI.A. PROGRAM OVERVIEW [NOTICE PIH 2021-15]

Emergency housing vouchers (EHVs) assist individuals and families who are experiencing homelessness; at risk of experiencing homelessness, fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

EHVs are a tenant-based rental assistance under section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)) and funded under the American Rescue Plan Act of 2021. EHVs are operated separately from the Housing Choice Voucher (HCV) program in accordance with Notice PIH 2021-15. HACSD administers 264 EHVs in coordination with the Regional Task Force on Homelessness (RTFH).

In accordance with the MOA between HACSD and RTFH, applicants are referred through the Coordinated Entry System (CES) and have access to a menu of services intended to facilitate and expedite leasing.

The PHA may not project-base EHVs as EHVs are tenant-based assistance with requirements that are inconsistent with the Project-Based Voucher program.

Funding Overview

The American Rescue Plan Act of 2021 (ARP) provides administrative fees and funding for the costs of administering emergency housing vouchers (EHVs) and other eligible expenses defined in Notice PIH 2021-15. These fees may only be used for EHV administration and other eligible expenses and must not be used for or applied to other PHA programs or vouchers. The PHA must maintain separate financial records from its regular HCV funding for all EHV funding.

Funds for EHVs may be recaptured and reallocated if the PHA does not lease its authorized EHVs within a reasonable period of time.

Housing Assistance Payments (HAP) Funding

ARP funding obligated to the PHA as housing assistance payments (HAP) funding may only be used for eligible EHV HAP expenses (i.e., rental assistance payments). EHV HAP funding may not be used for EHV administrative expenses or for the eligible uses under the EHV services fee.

The initial funding term expires December 31, 2022. HUD will provide renewal funding to the PHA for the EHVs on a calendar year (CY) basis commencing with CY 2023.

Administrative Fee and Funding

The following four types of fees and funding are allocated as part of the EHV program:

- **Preliminary fees** support immediate start-up costs that the PHA will incur in implementing alternative requirements under EHV, such as outreach and coordination with partnering agencies:

- \$400 per EHV allocated to the PHA, once the consolidated annual contributions (CACC) is amended.
- This fee may be used for any eligible administrative expenses related to EHV's.
- This fee may also be used to pay for any eligible activities under EHV service fees.
- **Placement fees/expedited issuance reporting fees** will support initial lease-up costs and the added cost and effort required to expedite leasing of EHV's:
 - \$100 for each EHV initially leased, if the PHA reports the voucher issuance date in Public Housing Information Center- Next Generation (PIC-NG) system within 14 days of voucher issuance or the date the system becomes available for reporting.
 - Placement fees:
 - \$500 for each EHV family place under a Hap contract effective within four months of the effective date of the aACC funding increment; or
 - \$250 for each EHV family placed under a HAP contract effective after four months but less than six months after the effective date of the ACCC funding increment.
 - HUD will determine placement fees in the event of multiple EHV allocations and funding increment effective dates.
 - Placement/expedited issuance fees only apply to the initial leasing of the voucher; they are not paid for family moves or to turnover vouchers.
- **Ongoing administrative fees**, which are calculated in the same way as the standard HCV program:
 - PHAs are allocated administrative fees using the full column A administrative fee amount for each EHV under contract as of the first day of each month.
 - Ongoing EHV administrative fees may be subject to proration in future years, based on available EHV funding.
- **Services fees**, which are a one-time fee to support PHAs' efforts to implement and operate an effective EHV services program in its jurisdiction:
 - The fee is allocated once the PHA's CACC is amended to reflect EHV funding.
 - The amount allocated is \$3,500 for each EHV allocated.

19-VI.B. SERVICES FEES

PHAs are allocated a one-time services fee to support efforts in implementing and operating an effective EHV services program that will best address the needs of EHV eligible individuals and

families. The amount allocated is equal to \$3,500 for each EHV allocation. This service fee is the combined total of the services fees for the menu of eligible use service to assist families to successfully lease units with the EHV's.

Services fee funding must be initially used for defined eligible uses and not for other administrative expenses of operating the EHV program. Services fees fall into four categories:

- Housing search assistance
- Security deposit/utility deposit/rental application/holding fee uses
- Owner-related uses
- Other eligible uses such as moving expenses or tenant-readiness services

The PHA must establish the eligible uses and the parameters and requirements for service fees in the PHA's administrative plan.

HACSD Policy

The eligible uses for service fees include:

Housing search assistance, which may include activities such as:

- Helping an individual or family identify and visit potentially available units during their housing search;
- Helping to find a unit that meets the household's disability related needs;
- Conducting owner outreach;
- Providing transportation and directions, assisting with the completion of rental applications and PHA forms;
- Helping to expedite the leasing process for the household; and
- Counseling on compliance with rental lease requirements.
- HACSD, RTFH and/or partnering service provider will assist eligible households by providing housing navigation services.

Application fees/Deposit Assistance

HACSD, RTFH and/or partnering service providers may also offer assistance from a menu of elective services, which may or may not be included under the Housing Navigation component:

- ***Application Assistance*** – Assist individuals with the completion of applications, forms, and collection of necessary documentation to support the eligibility and leasing process;
- ***Deposit Assistance**** – Assess households who may require assistance with security deposits, application fees or holding deposits, or utility deposits for initial service as follows:
 - Up to \$50 per application;
 - Up to ten days rent for holding deposit;
 - Up to two month's rent for security deposit assistance; and,

- Up to \$100 for utility deposit assistance.

**HACSD may assist with fees as funding permits*

- *Supportive Services* – Assess and refer households for supportive services and resources which may include voluntary case management, moving expenses, tenant readiness services, and essential household items supporting housing stability;
- *Owner Outreach* – Conduct owner recruitment and outreach as well as implement incentive and retention payments

Any services fee assistance that is returned to the PHA after its initial or subsequent use may only be applied to the eligible services fee uses defined in Notice PIH 2021-15 (or subsequent notice) or other EHV administrative costs. Any amounts not expended for these eligible uses when the PHA's EHV program ends must be remitted to HUD.

19-VI.C. PARTNERING AGENCIES[NOTICE PIH 2021-15, MOA]

Continuum of Care (CoC)

PHAs that accept an allocation of EHV's are required to enter into a Memorandum of Understanding (MOU) with the Continuum of Care (CoC) to establish a partnership for the administration of EHV's.

HACSD Policy

HACSD has entered into a Memorandum of Agreement (MOA) with the Regional Taskforce on Homelessness (RTFH).

Other Partnering Organizations

The PHA may, but is not required to, partner with other organizations trusted by persons experiencing homelessness, such as victim services providers (VSPs) and other community partners. If the PHA chooses to partner with such agencies, the PHA must either enter into an MOU with the partnering agency or the partnering agency may be added to the MOU between the PHA and CoC.

HACSD Policy

HACSD has not added additional partnering agencies to the MOA between the HACSD and RTFH.

Referrals

The primary responsibility of the CoC under the MOU with the PHA is to make direct referrals of qualifying individuals and families to the PHA. The PHA must generally refer a family that is seeking EHV assistance directly from the PHA to the CoC for initial intake, assessment, and possible referral for EHV assistance. Partner CoCs are responsible for determining whether the family qualifies under one of the four eligibility categories for EHV's. The CoC or other direct referral partner must provide supporting documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance.

HACSD must accept referrals in coordination with the RTFH servicing as the Coordination of Care (CoC). Services may be provided by the PHA and/or community service providers based on MOA/contract.

HACSD Policy

HACSD will implement the EHV program in partnership with the RTFH and connected providers.

Offers of Assistance with CoC Referral

The PHA may make an EHV available without a referral from the CoC or other partnering organization in order to facilitate an emergency transfer under VAWA in accordance with the PHA's Emergency Transfer Plan (ETP) in Chapter 16.

The PHA may take direct referrals from outside the CoC if:

- The CoC does not have a sufficient number of eligible families to refer to the PHA; or
- The CoC does not identify families that may be eligible for EHV assistance because they are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking.

If at any time the PHA is not receiving enough referrals or is not receiving referrals in a timely manner from the CoC or other partner referral agencies (or the PHA and CoC cannot identify any such alternative referral partner agencies), HUD may permit the PHA on a temporary or permanent basis to take EHV applications directly from applicants and admit eligible families to the EHV program in lieu of or in addition to direct referrals in those circumstances.

19-VI.D. WAITING LIST ADMINISTRATION

HCV Waiting List [Notice PIH 2021-15; EHV FAQ]

The regulation that requires the PHA to admit applicants as waiting list admissions or special admissions in accordance with admission policies in Chapter 4 does not apply to PHAs operating the EHV program. Direct referrals are not added to the PHA's HCV waiting list.

The PHA must inform families on the HCV waiting list of the availability of EHV by, at a minimum, either posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2021-15.

HACSD Policy

HACSD will post information about the EHV program for families on the PHA's HCV waiting list on its website. The notice will:

- Describe the eligible populations to which EHV are limited
- Clearly state that the availability of these EHV is managed through a direct referral process
- Advise the family to contact a Coordinated Entry Access Site if the family believes they may be eligible for EHV assistance

The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The PHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

EHV Waiting List

The HCV regulations requiring the PHA to operate a single waiting list for admission to the HCV program do not apply to PHAs operating the EHV program. Instead, when the number of applicants referred by the CoC or partnering agency exceeds the EHV's available, the PHA must maintain a separate waiting list for EHV referrals, both at initial leasing and for any turnover vouchers that may be issued prior to September 30, 2023.

The EHV waiting list is not subject to the PHA policies in Chapter 4 regarding opening and closing the HCV waiting list. The PHA will work directly with its CoC and other referral agency partners to manage the number of referrals and the size of the EHV waiting list.

HACSD Policy

HACSD operates a separate waiting list for EHV's. Applicants referred through the CES are placed on and selected from the EHV waiting list based on the priorities established through the MOA and EHV Priorities Document.

Upon turnover, EHV's are awarded to eligible applicants referred through CES, but may not be reissued after September 30, 2023.

Admission Preferences [Notice PIH 2021-15]

If local preferences established for HCV admissions, they do not apply to EHV's. However, if the PHA has a homeless preference or a VAWA preference for the HCV waiting list, the PHA must adopt additional policies related to EHV's in accordance with Notice PIH 2021-15.

HACSD Policy

HACSD has a homeless preference for the HCV program. EHV application and referral procedures are available on the HACSD website.

The PHA may establish, in coordination with the CoC and other referral partners, separate local preferences or may choose not to establish any local preferences for the EHV waiting list.

HACSD Policy

Distribution of referrals will be determined by the CES, according to geographical service needs, and local order of prioritization within program operating requirements.

HACSD will not establish local preferences for EHV but will give additional consideration for:

1. households that include older adults, as defined by age 55 and up, or
2. households eligible for Behavioral Health Services.

These additional considerations apply to each priority level listed on the EHV priorities table.

Referral Priorities [RTFH MOA, Priorities Document]

The RTFH will make eligible referrals in the following order:

Priority Level	Eligible Households	CES Target Groups
A1*	Homeless	Households in interim housing; and -Enrolled in programs that offer navigation, case management, and/or post-lease up retention services
A2*	Recently homeless and for whom providing rental assistance will prevent the household's homelessness or having high risk of housing instability	-Households enrolled in time-limited subsidy programs who need a permanent housing resource in order to achieve or maintain housing stability; and/or - Households that are survivors of domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined under Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act), the Violence Against Women Act (VAWA) and Trafficking Victims Protection Act (TVPA)
A3*	Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking	-Unhoused or housed households who are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking that do not meet Group 1 or 2.
B*	Homeless OR Recently homeless and for whom providing rental assistance will prevent the household's homelessness or having high risk of housing instability.	-Recently homeless and homeless households not identified in Priority Level A-Group 1 or 2
C*	At risk of homelessness	Households receiving prevention services that are targeted towards households that have a history of homelessness and are at very high risk of homelessness.

19-VI.E. FAMILY ELIGIBILITY [NOTICE PIH 2021-15]

The CoC determines whether the individual or family meets any one of the four eligibility criteria described in Notice PIH 2021-15 and then refers the family to the PHA. The PHA determines that the family meets other eligibility criteria for the HCV program, as modified for the EHV program and outlined below. HACSD may apply waivers and alternative requirements, in accordance with Notice PIH 2021-15, separate from the HCV program.

Unless expressly waived below, all statutory and regulatory requirements and HUD directives regarding the HCV program are applicable to EHV, including the use of all HUD-required contracts and forms. This includes the HACSD adopted CARES Act waivers according to the periods of availability and as authorized for EHV use.

Referring Agency Determination of Eligibility

To be eligible for an EHV, an individual or family must meet one of four eligibility criteria:

- Homeless as defined in 24 CFR 578.3;
- At risk of homelessness as defined in 24 CFR 578.3;
- Fleeing, or attempting to flee, domestic violence, sexual assault, stalking (as defined in Notice PIH 2021-15), or human trafficking (as defined in the 22 U.S.C. Section 7102); or
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability as determined by the CoC or its designee in accordance with the definition in Notice PIH 2021-15.

As applicable, the CoC or referring agency must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance. The PHA must retain this documentation as part of the family's file.

PHA Screening

HUD waived 24 CFR 982.552 and 982.553 in part for EHV applicants and established alternative requirements for mandatory and permissive prohibitions of admissions. Except where applicable, PHA policies regarding denials in Chapter 3 of this policy do not apply to screening individuals and families for eligibility for an EHV. Instead the EHV alternative requirement listed in this section will apply to all EHV applicants.

The mandatory and permissive prohibitions listed in Notice PIH 2021-15 and in this chapter, however, apply only when screening the individual or family for eligibility for an EHV. When adding a family member after the family has been placed under a HAP contract with EHV assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, the PHA must approve additional family members and may apply its regular HCV screening criteria in Chapter 3 to doing so.

Mandatory Denials

Under alternative requirements for the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(ii)(C), which prohibits admission if any household member has

ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.

- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

The PHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

Permissive Denials

Notice PIH 2021-15 lists permissive prohibitions for which the PHA may, but is not required to, deny admission to EHV families. The notice also lists prohibitions which may not be used to deny assistance to EHV families.

HACSD Policy

HACSD will only apply mandatory prohibitions.

Income Verification at Admission

Self-Certification at Admission

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to EHV program applicants at admission, and PHAs may consider self-certification the highest form of income verification at admission. Applicants must submit an affidavit attesting to their reported income, assets, expenses, and other factors that would affect an income eligibility determination.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dates within 60 days of the PHA's request.

HACSD Policy

Self-Certification/Self-Declaration may be used together with any other available sources to verify income. HACSD will allow ten days for the return of available verification of income before allowing self-certification. Any documents used for verification must be the original and dated within the 60-day period prior to admission.

Any family self-certifications must be made in a format acceptable to the HACSD and must be signed by the family member whose information or status is being verified.

Recently Conducted Income Determinations

PHAs may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:

- The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and

- The family certifies there has been no change in income or family composition in the interim.

HACSD Policy

HACSD will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.

The family certification must be made in a format acceptable to HACSD and must be signed by all adult family members whose information or status is being verified.

At the time of the family's annual reexamination the PHA must conduct the annual reexamination of income as outlined at 24 CFR 982.516 and policies in Chapter 11.

EIV Income Validation

Once HUD make the EIV data available to PHAs under this waiver and alternative requirement, the PHA must:

- Review the EIV Income and Income Validation Tool (IVT) reports to confirm and validate family-reported income within 90 days of the PIC submission date:
- Print and maintain copies of the EIV Income and IVT Reports in the tenant file: and
- Resolve any income discrepancy with the family within 60 days of the EIV Income and IVT Report dates.

Prior to admission, PHAs must continue to use HUD's EIV system to search for all household members using the Existing Tenant Search in accordance with PHA policies in Chapter 3.

If a PHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program in accordance with Chapter 12.

Social Security Number and Citizenship Status Verification

For the EHV program, the PHA is not required to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the EHV program. Instead, PHAs may adopt policies to admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless the PHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If the PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

HACSD Policy

HACSD will admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with the policies in Chapter 7 within 180 days of admission. HACSD may provide an additional 60-day extension

based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If HACSD determines that an ineligible family received assistance, HACSD will take steps to terminate that family from the program in accordance with policies in Chapter 12.

Age and Disability Verification

PHAs may accept self-certification of date and birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

HACSD Policy

HACSD will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to HACSD and must be signed by the family member whose information or status is being verified. If a self-certification is accepted, within 90 days of admission, HACSD will verify the information in EIV or through other third-party verification if the information is not available in EIV. HACSD will note in the family's file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant's date of birth and/or disability status.

Income Targeting

The PHA must determine income eligibility for EHV families in accordance with 24 CFR 982.201 and PHA policy in Chapter 3; however, income targeting requirements do not apply for EHV families. Households must still be below 50% AMI. The PHA may still choose to include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

HACSD Policy

HACSD may include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

19-VI.F. HOUSING SEARCH AND LEASING

Once the PHA determines that the individual or family meets EHV eligibility requirements, the individual or family will be issued an EHV voucher in accordance with PHA policies.

Initial Voucher Term

Unlike the standard HCV program, which requires an initial voucher term of at least 60 days, EHV vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Chapter 5-II.E. will apply.

Housing Search Assistance

The PHA must ensure housing search assistance is made available to EHV families during their initial housing search. The housing search assistance may be provided directly by the PHA or through the CoC or another partnering agency or entity.

At minimum, housing search assistance must:

- Help individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods;
- Provide transportation assistance and directions to potential units;
- Conduct owner outreach;
- Assist with the completion of rental applications and PHA forms; and
- Help expedite the EHV leasing process for the family.

HACSD Policy

As identified in the MOU between HACSD and RFTH, search assistance will be provided to each EHV family.

Eligible applicants will be notified by HACSD in writing following policies in Section 3-III.F. of this Plan. HACSD will provide all aspects of the written and oral briefing as outlined in Part I of Chapter 5 but will also discuss services as available by HACSD and partnering agencies.

Vouchers will be issued in accordance with HACSD policies in Chapter 5, Part II, except that the initial voucher term will be 120 days.

Once the individual or family locates a unit, the PHA conducts all other processes relating to voucher issuance and administration per EHV and HCV program regulation and the policies in Chapter 9.

HQS Pre-inspections

To expedite the leasing process, PHAs may pre-inspect available units that EHV families may be interested in leasing in order to maintain a pool of eligible units.

HACSD Policy

If an EHV family selects a unit that passed an HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved if it meets all other conditions under 24 CFR 982.305.

The family will be free to select their own unit.

Initial Lease Term

Unlike the standard HCV program, EHV voucher holders may enter into an initial lease that is for less than 12 months, regardless of the PHA policy in Section 9-I.E., Term of Assisted Tenancy.

After September 30, 2023, a PHA may not reissue any previously leased EHV, regardless of when the assistance for the formerly assisted family ends or ended. If an EHV is issued prior to September 30, 2023, and subsequently expires without being leased, the EHV may not be issued to another family.

19-VI.G. PORTABILITY

The normal HCV portability procedures and requirements outlined in Chapter 10 generally apply to EHVs. Exceptions are addressed below.

Nonresident Applicants

Under EHV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied, regardless of PHA policy in Section 10-II.B.

Billing and Absorption

A receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether the PHA does or does not currently administer EHVs under its own ACC.

- If the EHV family moves under portability to another PHA that administers EHVs under its own ACC:
 - The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do).
 - If the PHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.
 - Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving PHA's EHV policies, although neighboring PHAs and PHAs in the same metro area or region are strongly encouraged to work collaboratively with one another to align EHV policies and help facilitate EHV portability moves between their jurisdictions.
- If the EHV family moves under portability to another PHA that does not administer EHV under its own ACC, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

Family Briefing

In addition to the applicable family briefing requirements at CFR 982.301(a)(2) as to how portability works and how portability may affect the family's assistance, the initial PHA must inform the family how portability may impact the special EHV services and assistance that may be available to the family.

The initial PHA is required to help facilitate the family's portability move to the receiving PHA and inform the family of this requirement in writing taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).

HACSD Policy

In addition to the policy on briefings in Chapter 5, as part of the briefing packet for EHV families, HACSD will include a written notice that HACSD will assist the family with moves under portability.

For limited English proficient (LEP) applicants, HACSD will provide interpretation services in accordance with the LEP policies outlined in Chapter 2.

Coordination of Services

If the portability move is in connection with the EHV family's initial lease-up, the receiving PHA and the initial PHA must consult and coordinate on the EHV services and assistance that will be made available to the family.

HACSD Policy

For EHV families who are exercising portability, when HACSD contacts the receiving PHA in accordance with Section 10-II.B. *Pre-Approval Contact with Receiving PHA*, HACSD will consult and coordinate with the receiving PHA to ensure there is no duplication of EHV services and assistance, and ensure the receiving PHA is aware of the maximum amount of services fee funding that the initial PHA may provide to the receiving PHA on behalf of the family.

Services Fee

Standard portability billing arrangements apply for HAP and ongoing administrative fees for EHV families.

The requirements at CFR 982.355(e) apply to portability billing arrangements on behalf of an EHV family:

- The initial PHA must promptly reimburse the receiving PHA for the full amount of the housing assistance payments made by the receiving PHA for the family.
- The initial PHA must promptly reimburse the receiving PHA for the lesser of 80 percent of the initial PHA's EHV ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee (or the receiving PHA's EHV ongoing administrative fee if the receiving PHA administers the EHV program). If both PHAs agree, the PHAs may negotiate a different amount of reimbursement.
- For services fee funding, the amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the receiving PHA or \$1,750, unless the initial PHA and receiving PHA mutually agree to change the \$1,750 cap. Services fees are paid as follows: If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA. This is the case regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up.
- If the receiving PHA administers EHV's under its CACC, the receiving PHA may use its

own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance.

- If the receiving PHA does not administer EHV's under its CACC, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving the PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

When service fee arrangements are not known, the Housing Specialist must contact the other PHA to establish service fee arrangement and document election on the designated form.

HACSD Policy

HACSD will contact the other PHA to establish service fee arrangements on a case-by-case basis or as applicable to established cross-PHA agreements.

Placement Fee/Issuance Reporting Fee

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement/issuing reporting fee. The receiving PHA is eligible for the placement fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee, as applicable.

Note: The entire preliminary fee is always paid to and retained by the initial PHA and is not impacted by an EHV portability move.

19-VI.H PAYMENT STANDARDS

Payment Standard Schedule

For the EHV program, HUD has waived the regulation requiring a single payment standard for each unit size. Instead, the PHA may, but is not required to, establish separate higher payment standards for EHV's. Lower EHV payment standards are not permitted. If the PHA is increasing the regular HCV payment standard, the PHA must also increase the EHV payment standard if it would be otherwise lower than the new regular HCV payment standard. The separate EHV payment standard must comply with all other HCV requirements with the exception of the alternative requirements discussed below.

Further, if the PHA chooses to establish higher payment standards for EHV's, HUD has provided the following regulatory waiver defining the "basic range" for payment standards as between 90 and 120 percent of the published Fair Market Rent (FMR) for the unit size (rather than 90 to 110 percent).

HACSD Policy

HACSD has established a payment standard amount for EHV's at 120% of the SAFMR.

Rent Reasonableness

All rent reasonableness requirements apply to EHV units, regardless of whether the PHA has established an alternative or exception EHV payment standard.

Increases in Payment Standard

The requirement that the PHA apply increased payment standards at the family's first regular recertification on or after the effective date of the increase does not apply to EHV. The PHA may, but is not required to, establish an alternative policy on when to apply the increased payment standard, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change.

HACSD Policy

HACSD may apply increases in payment standards at interims.

19-VI.I TERMINATION OF VOUCHERS

After September 30, 2023, a PHA may not reissue EHV when assistance for an EHV-assisted family ends. This means that when an EHV participant (a family that is receiving rental assistance under a HAP contract) leaves the program for any reason, the PHA may not reissue that EHV to another family unless it does so no later than September 30, 2023.

If an applicant family that was issued the EHV is unsuccessful in finding a unit and the EHV expires after September 30, 2023, the EHV may not be reissued to another family.

All EHV under lease on or after October 1, 2023, may not under any circumstances be reissued to another family when the participant leaves the program for any reason.

An EHV that has never been issued to a family may be initially issued and leased after September 30, 2023, since this prohibition only applies to EHV that are being reissued upon turnover after assistance to a family has ended. However, HUD may direct PHAs administering EHV to cease leasing any unleased EHV if such action is determined necessary by HUD to ensure there will be sufficient funding available to continue to cover the HAP needs of currently assisted EHV families.

PART VII: HOME TBRA
[24 CFR 92]

19-VII.A. OVERVIEW

The HOME program awards grants to participating jurisdictions which can be used for rental assistance. Tenant-based rental assistance (TBRA) is a rental subsidy that can be used to assist individual households with rent and security deposits.

TBRA assistance moves with the tenant - if the household no longer wishes to rent a particular unit, the household may take its TBRA and move to another rental property within San Diego County.

The level of TBRA subsidy varies - the level of subsidy is based upon the income of the household, the particular unit the household selects, and the rent standard.

HOME Tenant-Based Rental Assistance (HOME TBRA) is funded under the Home Investment Partnership Act. These programs are designed to assist and support targeted populations.

19-VII.B. ADMINISTRATION

HACSD operates several HOME programs which provide term limited tenant-based rental assistance to designated vulnerable households., including:

- Former Foster Care Young Adults (FOSTER)
- Transitional Aged Youth (TAY)
- Family Reunification/Substance Abuse Treatment (SAT)
- Local Rent Subsidy (LRS)

Except as indicated, HOME TBRA is administered using the same eligibility criteria as the Housing Choice Voucher (HCV) program. Applicable HOME tenant-based rental assistance program regulations and requirements are found in 24 CFR 92.

The HACSD HOME TBRA program jurisdiction serves the San Diego County Unincorporated areas and the cities of Carlsbad, Coronado, Del Mar, Encinitas, Imperial Beach, La Mesa, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, and Vista.

HACSD does not maintain a waiting list. All applicants are referred as specified below.

The HOME Rental Assistance Contract, HOME Tenancy Addendum, and HOME Voucher are used with all HOME TBRA programs.

19-VII.C. REQUIREMENTS

Home Foster

HACSD partners with the County of San Diego, Health and Human Services Agency (HHSA), Child Welfare Services (CWS) and the Department of Homeless Solutions and Equitable Communities — Office of Homeless Solutions (HSEC-OHS) to assist participants with tenant-based rental assistance to young adults that transitioned or are transitioning from foster care.

HACSD Policy

HACSD has a Memorandum of Understanding (MOU) with the County of San Diego, Health and Human Services Agency (HHSA) to collaborate with eligible clients for housing assistance payments in accordance with 24 CFR 92.209, local HOME Tenant-Based policies and practices.

FOSTER is a transitional housing program, operated as a collaborative effort between the County of San Diego HHSA, Housing and Community Development Services (HCDS) and HACSD.

The program provides rental assistance, security deposit and utility assistance, as well as non-mandatory case management for up to 24 months to young adults admitted between the ages of 18 and 24 that were formerly in foster care. HOME funding supports the rental assistance component of the program.

Eligibility

Eligibility includes initial certification, annual recertification, and annual inspection of the units.

- Applicant is referred by HSEC-OHS.
- Applicant must have a source of income at or below 50% of the Area Median Income (AMI) for admission.
- Applicant is encouraged to maintain a full-time status of employment, training, or a combination of both.
 - Verification is reviewed by the Housing Specialist at initial eligibility, annual and interim reexamination, and whenever the household requests a transfer.
 - Work and/or school participation is monitored by HSEC-OHS.
- Term may not exceed 24 months from the date assistance begins. Youth may be admitted up to the age of 24 years old.
- Families are permitted to reside outside the HACSD HOME jurisdiction with a waiver. The waiver is completed by the HSEC-OHS.
- The family's rent share may not exceed 40% of the family's monthly-adjusted income.
- The 'minimum rent' is the total tenant payment of \$25 (rent and utilities).
- Annual HQS inspections are required.
- Annual recertification is required.

Subsidy Standards

Household Size	Voucher Size
1-2 persons	0 bedroom
3-5 persons	1 bedroom

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two

household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Payment Standard

The current Fair Market (FMR) is the payment standard.

Termination (Timing Out)

Households may not be assisted for more than 24 months. Reminder notices are mailed to the household at six months and 90 days prior to timing out. Termination notice is sent 30 days prior to termination.

HOME Investment Partnership Program TAY

HACSD partners with the County of San Diego, Health and Human Services Agency (HHSA) and the Department of Homeless Solutions and Equitable Communities — Office of Homeless Solutions (HSEC-OHS) to assist participants with tenant-based rental assistance to young adults 18 – 24 years of age.

HACSD Policy

HACSD has a Memorandum of Understanding (MOU) with the County of San Diego, Health and Human Services Agency (HHSA) to collaborate with eligible clients for housing assistance payments in accordance with 24 CFR 92.209, local HOME Tenant-Based policies and practices.

Transitional Aged Youth (TAY) is a transitional housing program, operated as a collaborative effort between the County of San Diego HHSA, Housing and Community Development Services (HCDS) and HACSD.

The program provides rental assistance, security deposit and utility deposit assistance, as well as non-mandatory case management for up to 24 months to young adults admitted between the ages of 18 and 24 that are experiencing homelessness or at risk of homelessness. HOME funding supports the rental assistance component of the program.

Eligibility

Eligibility includes initial certification, annual recertification, and annual inspection of the units.

- Applicant is referred by HSEC-OHS.
- Applicant must have a source of income at or below 50% of the Area Median Income (AMI) for admission.
- Applicant is encouraged to maintain a full-time status of employment, training, or a combination of both.
 - Verification is reviewed by the Housing Specialist at initial eligibility, annual and interim reexamination, and whenever the household requests a transfer.
 - Work and/or school participation is monitored by HSEC-OHS.
- Term may not exceed 24 months from the date assistance begins. Youth may be admitted up to the age of 24 years old.

- Families are permitted to reside outside the HACSD HOME jurisdiction with a waiver. The waiver is completed by the HSEC-OHS.
- Annual HQS inspections are required.
- Annual recertification is required.

Subsidy Standards

Household Size	Voucher Size
1-2 persons	1 bedroom
3-5 persons	2bedroom

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Payment Standard

The current Fair Market (FMR) is the payment standard.

Termination (Timing Out)

Households may not be assisted for more than 24 months. Reminder notices are mailed to the household at six months and 90 days prior to timing out. Termination notice is sent 30 days prior to termination.

Home SAT

HACSD partners with the County of San Diego, Health and Human Services Agency (HHSA), to assist participants of the County of San Diego's Substance Abuse Treatment (SAT) program. SAT is a tenant-based rental assistance program which provides rental, security deposit and utility assistance, and non-mandatory case management services and treatment supervision to families participating in the County's Substance Abuse Treatment program. Eligible participants must have an active Juvenile Dependency Court case and at least three months of documented sobriety. In addition, the lack of adequate housing must be documented to be a significant barrier to the return of the children to the family. The program is operated as a collaborative effort of HHSA, HACSD, and Housing and Community Development Services (HCDS). Case management and treatment supervision is provided as a program component.

HACSD Policy

HACSD has a Memorandum of Agreement (MOA) with the County of San Diego, Health and Human Services Agency (HHSA) to enter contracts with eligible clients for housing assistance payments in accordance with 24 CFR 92.209, local HOME Tenant-Based policies and practices.

Eligibility

Eligibility includes initial certification, annual recertification, and annual inspection of the units.

- Applicant is referred solely through a designated HHSA SAT case manager.
 - Intake is completed by the case manager

Housing Authority of the County of San Diego

- Applicant must have a source of income at or below 50% of the Area Median Income (AMI) for admission.
- Targeted population includes reunified families with children.
- Term may not exceed 18 months from the date assistance begins.
- Families are permitted to reside outside the HACSD HOME jurisdiction with a waiver. The waiver is completed by the CWS SAT Housing Coordinator.
- The family's rent share may not exceed 40% of the family's monthly-adjusted income.
- The 'minimum rent' is the total tenant payment of \$25 (rent and utilities)
- Annual HQS inspections are required.
- Annual recertification is required.

Subsidy Standards

Household Size	Voucher Size
1-2 persons	1 bedroom
3-5 persons	2 bedroom

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Payment Standard

The current Fair Market (FMR) is the payment standard.

Termination (Timing Out)

Households may not be assisted for more than 18 months. Reminder notices are mailed to the household at six months and 90 days prior to timing out. Termination notice is sent 30 days prior to termination.

Local Rent Subsidy Program (LRSP)

The Local Rent Subsidy (LRS) program is a term limited program that provides up to two years of rental assistance to a limited number of persons transitioning out of County emergency shelter programs, including the Hotel/Motel Voucher program. This program is funded in part by HOME Investment Partnership program funds. LRSP will adhere to the Emergency Housing Voucher operating requirements and the Housing Choice Voucher (HCV) program unless otherwise indicated to comply with 24 CFR 92.209 or other direction of the County Board of Supervisors.

HACSD Policy

Eligibility

Eligible participants must be:

- Transitioning out of County emergency shelter programs, including the Hotel/Motel Voucher program, and;

- At the time of admission into the shelter program met the HUD definition of literally homeless, and;
- Were experiencing homelessness in the unincorporated areas of San Diego County.

LRSP will be administered as follows:

- *Income Limits:* Eligible LRSP participants' income must be at or below 50% Area Median Income (AMI).
- *Payment Standard:* The LRSP adheres to the following Fair Market Rent (FMR) standards.
- *Program Duration:* Participants may receive up to 24 months of rental assistance.
- *Criminal Prohibitions:* The LRSP applicants and their household members will have their criminal histories verified. Those subject to a lifetime registration requirement under a state sex offender registration program and/or those convicted of manufacturing or producing methamphetamines on the premises of federally assisted housing, are ineligible for the program.
- *Debt Owed to PHA:* If participant owes debt to the Public Housing Authority, they are eligible to participate in the LRSP as long as they make monthly payments toward that debt while receiving rental assistance from County HCDS.
- *Service Area:* LRSP participants may lease up in areas outside of the County of San Diego Public Housing Authority with an approved waiver.
- *Eligibility for HCV:* In determining eligibility to the HCV program, participants of the LRSP, will qualify for the tenant selection preference of homelessness and/or any other applicable preference to the same extent as when they were determined eligible for LRSP as outlined in 24 CFR 92.209(I).

Referral Process

Eligible clients are referred by the contracted service provider.

Notification of Program Ending

As much as possible, program participants will receive notification of program end date at ninety, sixty, and thirty days prior to program end. At a minimum, participants will receive a two-week notice of program end.

HCDS (in collaboration with service providers) will evaluate availability and/or eligibility to HCV or other permanent housing programs for each participant transitioning from the LRSP.

Chapter 20 - FAMILY SELF SUFFICIENCY PROGRAM
[24 CFR 984]

INTRODUCTION

The Family Self-Sufficiency (FSS) is a voluntary program for HACSD Housing Choice Voucher Program participants who are committed to becoming economically self-sufficient.

Part I: Administration of the FSS Program. This part details the HACSD's Action Plan for administering FSS.

Part II: Affirmatively Furthering Fair Housing-FSS. This part explains how the PHA will further fair housing

PART I: ADMINISTRATION OF FSS

20-I.A. OVERVIEW

This Action Plan was developed as required under Section VIII of the Federal Register, Vol. 56, No. 189, dated September 30, 1991. The Action Plan describes the activities the Housing Authority of the County of San Diego (HACSD) will carry out in the implementation and operation of the Family Self-Sufficiency Program (FSS). Modifications to this Action Plan are made in compliance with provisions of Federal Register, Vol. 58, No. 101, Thursday, May 27, 1993, Rules and Regulations and Federal Register, Vol. 87, No. 95, Tuesday, May 17, 2022, Rules and Regulations. This Action Plan was last updated August 2022 in accordance with the provisions of 24 CFR Part 984.

20-I.B. INTRODUCTION

Timetable for Implementation of FSS Program

The HACSD committed to begin the operation of the FSS Program within 12 months of HUD's notification of approval of the first increment of funding in support of the FSS Program. Eligible families selected to participate in the FSS program began to receive supportive services within 12 months of the implementation of the program.

Estimate of Participating Families [24 CFR 984.105]

HUD has established a calculation for a minimum program size for an agency's FSS program. This calculation is based on the number of FSS Incentive slots funded in 1991/1992 and additional funding received from 1993 through October 20, 1998. The HACSD was awarded 75 incentive slots to begin the FSS program in 1992. Additional funding of 86 slots in 1993 and 185 slots in 1994 make the original size of the FSS program 346 families. Beginning October 21, 1998, Housing Authorities could reduce the minimum program size by one for each successful graduate of the agency's FSS program. A successful graduate is one who fulfills their contract of participation obligations. From October 21, 1998, through July 31, 2021, there have been 350 successful graduates from the FSS program. As of August 1, 2021, the minimum program size for the FSS program is 52 families. There were 63 families receiving services as of that date. The HACSD will continue to maintain an FSS Program of at least the number of participants required to meet 80% of the minimum program size and will exceed it, if staffing and funding are available to do so.

Certification of Coordination

The HACSD certifies that the development of services and activities under the FSS program has been and will continue to be coordinated with the JOBS Program; the programs provided under the JTPA, and any other relevant employment, child care, transportation, training, and educational programs to avoid duplication of services and activities.

Optional Additional Information

The HACSD successfully developed, administered and operated the Project Self-Sufficiency Program and the Operation Bootstrap Program. Through these efforts the HACSD assisted more than 100 participants, reducing public dependency by providing them the opportunity of education, training, and other supportive services.

Throughout the more than 36 years of experience with housing programs, the HACSD has implemented the Section 8 Existing Housing Assistance Program, Housing Choice Voucher and

Moderate Rehabilitation Program, the Section 17 Rehabilitation Program, the Conventional Public Housing Program and developed local rental assistance programs for participating cities. In addition, the HACSD has participated with the Department of Health in implementing the National Institute for Mental Health Program, which provides comprehensive services to mentally ill homeless.

The HACSD will operate individually. This FSS Action Plan, unless otherwise modified, will apply to the Section 8 Housing Choice Voucher FSS Program only.

20-I.C. ELIGIBILITY AND SELECTION

FSS Family Selection

The HACSD will select FSS participants from current Housing Choice Voucher participants including all special purpose vouchers. When staffing and/or funding does not allow families to be added to the FSS Program, a waiting list will be maintained. When staffing/funding resumes, families will still be served based on the date their application was received. This ensures families on the waiting list will be served according to application date regardless of race, color, religion, sex, handicap, familial status, or national origin. As provided under the regulations, 50% of the FSS slots may be made available to eligible families who have one or more family members who are: currently enrolled in public assistance benefits such as CalWORKs (formally known as TANF); are in any of the job training programs provided by PIC; are in any other FSS-related service program; or are on the waiting list for such a program. The other 50% of the FSS slots will be allocated to other families on a first-come, first-served basis.

Family Demographics

In September 2022, there were 72 active FSS participants. They fall into the following categories:

HCV Participants	Household Type	FSS Participants
53%	Elderly/disabled households	16%
88%	Small families (1-4 members)	83%
12%	Large families (5+ members)	16%
65%	Non-Hispanic	54%
35%	Hispanic	46%
80%	White	65%
16%	Black	32%
1%	American Indian	1%
3%	Asian	1%
1%	Pacific Islander	1%

It is anticipated that the ethnic and racial representation in the FSS Program will reflect that of the Housing Choice Voucher participant population in the jurisdiction of the HACSD.

The need for supportive services for the low-income families living in San Diego County is no different from the daily challenges of low-income families living elsewhere. Some of these families lack the education or job skills to find a well-paying job; these families lack knowledge of the job market, financial resources to pay for childcare while seeking a job and transportation to seek and

maintain a job. However, in San Diego County these problems are compounded by extremely high housing costs. As a result, San Diego County's low-income households will require, among other services, higher education opportunities and transportation services in order to compete in the current job and rental market. To assist families facing barriers to self-sufficiency, the Housing Authority of the County of San Diego has obtained the following resources and services developed through intra-agency, public, and private partnerships:

- Healthcare Education
- Nutritional Education
- Career Counseling
- Parenting Skills
- Financial Literacy
- Credit Building
- Mental Health
- Housing Navigation
- Food Insecurity Services
- Computer Lab, Printing Services, Wi-Fi Accessibility
- Meeting Spaces
- GED, High School Diploma and/or College Education
- Vocational Training
- Job Training, Preparation, and Placement
- Homeownership Counseling
- Moral Support
- Resource/Service linkage with CalFresh, Medi-Cal, Aging and Independence Services, and other Social Services

20-I.D. DENIAL OF PARTICIPATION

A request for participation in the FSS program may be denied under the following circumstances:

- Beginning April 1, 2008, if the family previously participated in an FSS program with the HACSD or any other housing authority
- If a family has participated in and successfully completed any FSS program
- Family was terminated with Escrow Disbursement

At its discretion, the HACSD may permit a family who has previously participated in any FSS program, but did not successfully complete their contract, to reapply for the FSS program no sooner than one year after the termination date of the contract.

20-I.E. INCENTIVES TO ENCOURAGE PARTICIPATION

An integrated services approach is essential to enhancing the self-esteem of low-income families who have the desire to work but lack the belief that they will be successful. Additionally, this approach will make them aware of new career possibilities, and then provide them with the education and training necessary to achieve their heightened aspirations.

To encourage participation in the FSS program, the HACSD is providing the following incentives:

FSS Escrow Account

The HACSD will establish an escrow account for each FSS participant. The amount deposited into an escrow account represents the increase in rent resulting from an increase in earned income from the initial FSS contract start date. This amount is deposited for the benefit of the

participant into the escrow account by HACSD. The escrow account becomes available to the family after they have fulfilled their obligations under the contract, or if the family meets interim goals and needs the escrow funds to complete their contract.

HACSD participates in quarterly Program Coordinating Committees (PCC) intended to increase awareness of public and private resources. Through the PCC and local efforts, the HACSD will provide information and referrals to the FSS participant for an array of support services. HACSD certifies that the development of the services and activities scheduled to be provided under this FSS program have been coordinated with public and private partners (both PCC members and non-PCC members), including self-sufficiency programs of the Department of Labor and Health and Human Services Agency, and other employment, childcare, transportation, training and education programs. These services will assist participants in removing barriers to self-sufficiency, and may include:

- Transportation
- Child Care
- Nutritional Education
- Career Counseling
- Parenting Skills
- Financial Management
- GED, High School Diploma, and/or
- College Education
- Vocational Training
- Job Training, Preparation and Placement
- Homeownership Counseling
- Moral Support
- Treatment and Counseling for Substance and Alcohol Abuse

Resources

The HACSD has developed and distributes resource information through newsletters and/or emails for FSS participants. These newsletters/emails highlight resources, available services, and accomplishments. Additionally, the FSS team has hosted in-house workshops for participants on topics such as personal finance, credit repair and preparing for college. Resource newsletters may be distributed by mail, email and/or be posted on HACSD website. Also, e-mail blasts are regularly sent to program participants to let them know about available resources such as: job announcements, trainings, and scholarships for specialized programs.

Scholarships

The HACSD may offer scholarships to FSS participants and other household members each semester based on funding availability, once in the spring and once in the fall, during the academic year, depending on funding. As of June 30, 2021, the FSS Scholarship Program has awarded 131 scholarships to FSS participants and their families. These awards total \$114,407 in funds that can be used towards school-related expenses, including tuition, books, transportation, room and board, and more. Scholarships are available in the following amounts: \$500 for undergraduate and graduate level studies; up to \$250 for associates and technical level studies; \$150 for GED and high school certifications.

Scholarship recipients are chosen based on certain criteria including successful completion of the application, completion of an essay, submission of a class schedule and good standing with the Section 8 program. Additional requirements vary by year.

20-I.F. OUTREACH EFFORTS

The HACSD serves nearly 11,000 low-income families under the Housing Choice Voucher program. HACSD employs a multitude of outreach methods such as:

- Holding FSS PowerPoint presentation during briefings
- Sharing and advertising stories of successful FSS graduates using brochures
- Using a web page dedicated to the FSS program to provide information on the benefits of the FSS program and how successful completion of FSS goals can support current and future self-sufficiency goals
- Face-to-face interviews and discussions with potential FSS candidates
- Word of mouth referrals from past and current participants
- Staff and self-referrals
- Provision of curbside materials promoting the FSS Program.

Outreach for the FSS program may be done by sending applications with annual renewal packets, and/or by providing program information to supportive service agencies. Outreach efforts will target both minority and non-minority groups. Referrals may also be accepted from Housing Specialists and other program staff.

Assurance of Non-Interference with the Rights of Non-Participating Families

Participants of the Housing Choice Voucher program will be invited to participate in the FSS program. The invitation will make it very clear that non-participation in the FSS program will in no way affect the family's right to continue rental assistance or their participation in the Housing Choice Voucher program.

20-I.G. FSS ACTIVITIES AND SUPPORTIVE SERVICES

Method for Identification of Family Support Needs

The FSS Program will identify the needs of the interested families by requiring each family to complete a Family Self-Sufficiency Application. Active FSS participants are asked to complete a biannual survey. The answers provided in the application and biannual survey will be evaluated by HACSD staff, and the family will be referred to appropriate resources. Resources may include service providers who assess the specific services the participant would need to meet their particular plan and/or goal in order to lead them to economic self-sufficiency.

Committed Supportive Services

Current services, as indicated under Incentives, that may be provided to FSS participants include:

- | | |
|---|--|
| • Opportunities of Higher Education | • Housing Assistance |
| • Transportation | • Job Training and Referral Services |
| • Individual Counseling by Trained Social Workers | • Child Care |
| • Skills Assessment Services | • Vocational Training |
| • Job Development Counseling | • English as a Second Language (ESL) Classes |

Additional Services

Through existing County of San Diego services, participants may be referred and have access to other services such as:

- Career Development Services
- Health and Preventive Health Care
- Nutrition Classes
- Consumer Rights
- Budgeting Skills
- Legal Services
- Housekeeping and Appliance Maintenance

The HACSD will continue to provide rental assistance to families who meet eligibility criteria and otherwise comply with HUD program requirements and HACSD policy. Participants will be provided information on how to select appropriate housing that meets Housing Quality Standards, and referrals to participating landlords will be furnished whenever possible. Participants will have access to a Housing Specialist assigned to manage their rental assistance contract.

Individual Training and Service Plan Goals

The Individual Training and Services Plan (ITSP) will be developed with the individual FSS participant. HACSD FSS program staff will work with participants to develop employment-related goals that span the term of their contract. Goals may also include homeownership preparation.

Two types of goals will be developed: Long-term or final goals and short-term or interim goals. Goals, both short-term and long-term, will generally follow the “SMART” format:

- **S**pecific, stretch
- **M**easurable, meaningful
- **A**ttainable, agreed upon, action-oriented
- **R**ealistic, reasonable
- **T**ime based, tangible

Live Well Service Plan

To align with *Live Well San Diego*, the County of San Diego’s vision for a region that is Building Better Health, Living Safely and Thriving, FSS participants are encouraged to develop goals in each of the Live Well components (Health, Safety, Thriving). These goals are in addition to and support the participant’s FSS ITSP goals.

Designation of the Head of the FSS Family

A determination of the Head of the FSS Family will be decided by a majority of the legally consenting adult within the family composition by signing the Head of FSS Family Acknowledgment Form to acknowledge the sole designee as Head of the FSS Family.

20-I.H. CONTRACT OF PARTICIPATION

To participate in FSS, the head of the FSS Family must enter into a 5-Year Contract of Participation (CoP) with the HACSD, unless otherwise specified for FUP youth. The Head of the FSS Family is responsible for developing a list of self-sufficiency goals with the support of the FSS Coordinator including signing the CoP after goal development and assuming the role of designee for the FSS Escrow account.

Requirement to Seek and Maintain Suitable Employment

The Head of the FSS Family is required to seek and maintain suitable employment throughout the term of their contract. The HACSD FSS program may require the FSS head of household to provide written verification of these activities.

Employment-related goals for disabled participants will be based on their ability to work.

Contract Changes

A newly executed FSS contract is not to have a retroactive start date. The contract start date can be as soon as the beginning of the next following month. Participants will be allowed to change their goals no more frequently than once per year, and no changes will be allowed in the last six months of their contract term. Only two changes will be allowed in the five-year term of the contract unless extreme hardship can demonstrate the need for additional changes of goals.

Participants enrolled in FSS prior to June 16, 2022, will adhere to the guidelines for FSS action plan commencing September 2013, or may opt into the requirements under FSS Action Plan commencing August 2022. Once the participant opts into the 2022 FSS Action Plan they may not return to the former plan requirements.

Contract Extensions

The initial term of the FSS Contract of Participation is five years. If a family cannot meet their goals within the five years, they may request an extension. The request must be in writing and be made during the last 12 months of their contract. The request must be received at least 30 days before the contract end date. An extension may be granted to a family if they are unable to meet the terms of their contract due to circumstances beyond their control and an extension of time will allow them to complete their contract goals successfully.

Other good cause extensions may be granted for active pursuit of a current or additional goal that will result in the furtherance of self-sufficiency during the period of the extension, or any other circumstance the HACSD deems to be a good cause. Under no circumstance will the total duration of extensions exceed a total of two years, or a maximum of seven years from the first income re-certification (interim or annual) after the execution of the Contract of Participation.

Contract Completion

The FSS Contract of Participation will be considered complete when the family has:

1. Met the goals established in their Contract of Participation, including all family member's ITSPs;
2. Provided the FSS Coordinator(s) written verification and/or documentation indicating the completion of each Contract of Participation goal. The verification/documentation provided for each goal must match each goal; and
3. No member of the FSS family is receiving a welfare benefit of any kind at the time of graduation.

20-I.I. TERMINATION OF CONTRACT OF PARTICIPATION

The FSS Contract of Participation will be terminated if the family's participation in the Section 8 Housing Choice Voucher program is terminated. The FSS Contract of Participation may also be terminated for non-compliance or non-participation in the FSS program. A family may voluntarily request that their FSS contract be terminated. The family's rental assistance will not be terminated for non-compliance or non-participation in the FSS program. [FR Notice 12/29/14].

If a family's FSS contract is terminated (for any reason), any and all money in the family's FSS escrow account will be returned to the HACSD to be used for rental assistance for other families. The family will not be entitled to this money, nor will it be applied to any money owed to the HACSD.

Hearing requests

A hearing will be offered to the participant at the time a negative action is taken including:

- The denial of participation;
- Termination of the FSS contract;
- Forfeiture of FSS Escrow account monies.

The hearing request process will be the same as for the Housing Choice Voucher Program and is described in this Administrative Plan.

20-I.J. ESCROW ACCOUNT

The HACSD will establish an escrow account for each FSS participant. The amount deposited into an escrow account represents the increase in rent resulting from an increase in earned income from the initial FSS contract start date. This amount is deposited for the benefit of the participant into the escrow account by HACSD. The escrow account becomes available to the family after they have fulfilled their obligations under the contract, or if the family meets interim goals and needs the escrow funds to complete their contract.

Eligibility to Receive Escrow Funds

Upon successful completion of the terms of the contract, the HACSD will begin the process to pay out the balance of FSS Escrow account. Interest earned on the FSS escrow account will be added to the escrow balance and paid to the qualifying FSS participant upon completion of the FSS contract. The FSS escrow account only earns interest for the quarter once it has been posted by the Auditor and Controller after each quarter ends. FSS participants graduating mid-quarter will include the interest only through the most recently posted quarter. If the family owes the HACSD money, the debt to the HACSD will be paid first from the escrow account and any balance remaining will be paid to the family.

A family may request an interim payout from their escrow account before they have completed their contract. Interim payouts are intended to help the participant achieve a goal that they would not otherwise be able to achieve. An interim payout will be considered if each of the following criteria are met:

1. The family makes the request in writing explaining the need for the money, the amount requested and who the check should be made payable to; and
2. The family has made demonstrable progress towards their goal; and
3. The amount requested is not more than 30% of the balance of their escrow account at the time of the request; and

4. The family can demonstrate how the money will help them meet their final goals; and
5. The family can demonstrate how all known or available resources have been exhausted.

A maximum of two interim payouts from the FSS escrow account will be allowed per contract term for the participating FSS family.

Forfeiture of Escrow

If a family's FSS contract is terminated (for any reason), any and all money in the family's FSS escrow account will be placed in an FSS Escrow reserve account for FSS families in good standing to utilize to provide support and eliminate barriers to achieving goals of self-sufficiency. FSS Escrow reserves may be used for, but are not limited to, the following resources and services to support FSS families in good standing:

- Transportation
- Childcare
- Training
- Testing fees
- Employment preparation costs
- Other costs related to achieving obligations outlined in the CoP
- Training for FSS Program Coordinators

Requests to utilize FSS Escrow reserves will be reviewed on a case-by-case basis and HACSD has discretion to approve, limit, or deny the disbursement of FSS Escrow reserves to participant based on funding availability, funding limits, and/or the pertinence of the requested use of FSS Escrow reserves relative to the CoP goals.

Termination with Escrow Disbursement

An FSS family may request an escrow disbursement under the circumstances of a good-cause termination where graduation is not feasible under the following scenarios:

- The HACSD and family agree that one or more services/resources are both critical and unavailable;
- The Head of the FSS family becomes permanently disabled and unable to work after having earned escrow and there is no other household member able or willing to assume the Contract of Participation; or,
- The family ports in a situation where they are unable to continue the Contract of Participation, have not yet met the requirements for graduation, and the HACSD determines that there is good cause for termination with escrow disbursement.

20-I.K. FSS PORTABILITY

FSS Family Port-In

If a family is exercising the portability option and is moving into the HACSD's jurisdiction and is an active participant of the initial HA's FSS program, the family will be admitted to the HACSD's FSS program and the voucher will be absorbed. The family must sign a new FSS contract with the HACSD; however, the original contract information and dates will be continued. The goals and activities will be re-evaluated.

If the HACSD is administering vouchers on behalf of the initial Housing Authority for families porting into the HACSD, the voucher will only be absorbed once the new contract is signed.

When the family ports in, the family will be contacted to see if they would like to be admitted into the HACSD's FSS program. If the family wishes to continue their FSS program, with HACSD, the initial Housing Authority will be contacted for a copy of the family's original FSS contract and escrow account balance. When both have been received, a new FSS contract will be executed with the family to continue the term of their original contract.

The HACSD will not allow a family using the portability option to be admitted to a receiving agency's FSS program until the receiving agency absorbs the family's voucher.

Non-FSS Family Port-In

If a family is porting in and wishes to join FSS, and HACSD is absorbing their voucher, the family will go on the FSS waiting list until such time as their name is pulled from the list. If HACSD is not absorbing, and is administering the voucher, the family will remain on the FSS waiting list until HACSD is able to absorb the voucher. In both cases the family remains on the waiting list until such time as the voucher has been absorbed by HACSD and the family has also been pulled from the FSS waiting list.

FSS Participant Port Out

If a FSS participant wishes to port out of the HACSD jurisdiction, they may take their FSS contract with them, if certain circumstances are met:

1. The family must have been enrolled in and participating the HACSD's FSS program for at least 12 months before porting out.

AND

2. The receiving Housing Authority will absorb the family's voucher and FSS contract.

If the family decides to move before the end of the 12 months or if the receiving agency will not absorb their voucher and FSS contract, the family's FSS contract will be terminated, and any escrow money will be returned to the HACSD's FSS Escrow Reserves.

Exhibit 20-1: FSS Action Plan Comparison

FSS Plan prior to 6/16/22	FSS Plan on or after 6/16/22	Key Change
Head of Household Under the previous FSS Regulations, the Head of Household (HoH) was the only family member allowed to sign the FSS Contract of Participation (CoP). This means the HoH was the only household member eligible to accrue escrow. If the HoH was unable to work due to a disability, the family would not be able to receive any escrow funds through increasing their earned income.	Head of FSS Family Under the new FSS Regulations, the Head of the FSS Family does not need to be the Head of Household (HoH). The Head of the FSS Family must be an adult designated by other legally consenting adults in the household to be the Head of the FSS Family.	Any adult designated by the family can be the Head of the FSS Family as opposed to the HoH being designated as the Head of the FSS Family.
Termination with Escrow Disbursement Under the previous FSS Regulations, there was no provision for termination with escrow disbursement.	Termination with Escrow Disbursement Under the new FSS Regulations, An FSS Family may request an escrow disbursement under circumstances of a good cause termination, where graduation is not feasible under the following scenarios: <ol style="list-style-type: none"> 1. The HACSD and family agree that one or more services/resources are both critical and unavailable. 2. The Head of the FSS Family becomes permanently disabled and unable to work after having earned escrow and there is no other household member able or willing to assume the Contract of Participation. 3. The family ports in a 	FSS regulations now allow for good cause terminations with escrow disbursement

	situation where they are unable to continue the CoP but have not yet met the requirements for graduation and the HACSD determines there is good cause for termination with escrow disbursement.	
Contract of Participation - Under the previous FSS Regulations, the HoH was required to sign a five-year CoP, which commenced on the first of the month following the month the CoP was signed. Additionally, the end date of the CoP was five years minus one day from the commencement of the CoP.	Contract of Participation - Under the new FSS Regulations, the Head of the FSS Family is required to sign a CoP, which commences on the first of the month following the month the CoP is signed. Additionally, the end date of the CoP is five years minus one day from the first income re-certification (interim or annual) after the execution of the CoP.	End date of the CoP is five years minus one day from the first income re-certification (interim or annual) instead of the commencement of the CoP.
Requirement to Seek and Maintain Suitable Employment - Under the previous HACSD FSS Action, the HACSD required FSS Participants to be working 32 hours per week by contract completion if the participant's goal was to be working full-time.	Requirement to Seek and Maintain Suitable Employment - Under the new FSS Regulations, no working hour requirements can be on placed on FSS Participants, as suitable employment is based on each family's unique and individual circumstances.	Removal of the 32-hour full-time employment requirement.
Good Cause Extensions - Under the previous FSS Regulations, "Good Cause Extensions" were only granted when the family was unable to meet their goals for circumstances beyond the family's control.	Good Cause Extensions - Under the new FSS Regulations, "Good Cause Extensions" are granted when the family was unable to meet their goals for circumstances beyond the family's control; active pursuit of a current or additional goal that will result in the furtherance of self-sufficiency during the period of the extension; or any other	Added additional good cause extensions for active pursuit of a current or additional goal, and any other circumstance the HACSD deems to be a good cause.

	circumstance the HACSD deems to be a good cause.	
Contract Completion FSS contracts are considered complete when the family: <ol style="list-style-type: none"> 1. Meets the goals established in their Contract of Participation; and 2. Progress in their career during the time on the FSS program; and 3. Have not received any kind of welfare benefit for the last 12 months of their contract. OR <ol style="list-style-type: none"> 1. 30% of the family's monthly adjusted income equals or exceeds the SAFMR for the size unit for which the family qualifies for; and 2. The family had not received any kind of welfare benefit for the last 12 months of their contract. 	Contract Completion FSS contracts are considered complete when the family: <ol style="list-style-type: none"> 1. Meets the goals established in their Contract of Participation, including all family member's ITSPs; 2. Provides the FSS Coordinator(s) written verification and/or documentation indicating the completion of each Contract of Participation Goal. The verification/documentation provided for each goal must match each goal. 3. Have not received a welfare benefit of any kind of at the time of graduation (this provision includes everyone who is a part of the household composition). 	Removed 30% rule and requirement for the FSS Family to be welfare-free for the last 12 months of their FSS contract. Families only need to be welfare free at the time of graduation.
Forfeited Escrow Under the previous FSS Regulations, forfeited escrow was released back to the HAP to provide rental assistance for HCV families in good standing.	Forfeited Escrow Under the new FSS Regulations, forfeited escrow is released to FSS Escrow Reserves for FSS families in good standing to utilize to provide support and eliminate barriers to achieving goals of self-sufficiency.	Forfeited escrow may no longer be used for HAP. Eligible uses for forfeited include but are not limited to training for FSS Program Coordinator(s), transportation, childcare, training, testing fees, employment preparation costs, and any other support or resources that would eliminate barriers to achieving goals of self-sufficiency for FSS families in good standing.

PART II: AFFIRMATIVELY FURTHER FAIR HOUSING- FSS PROGRAM

[24 CFR 984.104(c)]

20-II.A. OVERVIEW

An FSS program established under this part shall be operated in compliance with the nondiscrimination and equal opportunity requirements set forth in 24 CFR part 5, with the exception of Executive Orders 11246, 11625, 12432, and 12138.

20-II.B. AFFIRMATIVELY FURTHERING FAIR HOUSING- FSS PROGRAM

In the administration of its Family Self-Sufficiency program, the HACSD will follow the processes and procedures already established in the Section 8 Housing Choice Voucher Program Administrative Plan (Chapter 2) and:

- Market the Family Self-Sufficiency program equally to all eligible Section 8 Housing Choice Voucher families, including to persons with disabilities and to persons with limited English proficiency.
- Ensure buildings and communications that facilitate applications and service delivery are accessible to persons with disabilities.
- Provide referrals to fair housing agencies as needed or requested.
- Inform participants how to file a fair housing complaint including providing the toll-free number for the Housing Discrimination Hotline.

20-II.C. RECORDS MANAGEMENT

Records will be maintained in individual case files and in FSS Coordinator files that document participant referrals to fair housing agencies. Information on race, ethnicity, familial status, and disability status of FSS program participants and all Section 8 Housing Choice Voucher participants is kept and transmitted to HUD regularly via form HUD-50058.

Exhibit 1 – HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT (HOTMA) of 2016

BACKGROUND; Notice PIH 2023-27

The Housing Through Modernization Act (HOTMA) was signed into law on July 29, 2016 (Public Law 114–201, 130 Stat. 782). The HOTMA statute consists of 14 sections of law that affect the Public Housing and Section 8 rental assistance programs. On September 17, 2019, HUD issued a proposed rule to update its regulations according to HOTMA's statutory mandate. The proposed rule may be found at 84 FR 48820 (September 17, 2019).

Sections 102 and 104 of HOTMA make sweeping changes to the United States Housing Act of 1937 (1937 Act), particularly those affecting income calculations and reviews. Section 102 changes requirements related to income reviews for Public Housing and Section 8 programs. Section 104 sets maximum asset limits for Public Housing and Section 8 applicants and participants.

Section 102 of HOTMA applies to all PHAs operating a Housing Choice Voucher (HCV) (including Project-Based Vouchers), Public Housing; Section 8 Moderate Rehabilitation, or Section 8 Moderate Rehabilitation Single Room Occupancy (SRO), including Moving to Work (MTW) Agencies (see Section 4 (Notice Applicability) of this notice). Section 102 also applies to the following programs administered by MFH: Section 8 Project Based Rental Assistance (PBRA), 202/8, 202/162 Project Assistance Contract (202/162 PAC), Section 202/811 Capital Advance with Project Rental Assistance Contract (202/811 PRAC), non-insured 236 projects with Interest Reduction Payments (236 IRP), Section 811 Project Rental Assistance Demonstration (811 PRA), and Senior Preservation Rental Assistance Contracts (SPRAC).

Section 104 of HOTMA applies to all PHAs operating an HCV, Public Housing, Section 8 Moderate Rehabilitation, or Section 8 Moderate Rehabilitation SRO program, including MTW Agencies (see Section 4 (Notice Applicability) of this notice). Section 104 also applies to the following programs: Section 8 PBRA and 202/8. Section 104 does not apply to following programs: 202/811 PRAC, 236 IRP, 811 PRA, and SPRAC.

Overview

Compliance Date and Required Actions for PHAs (Office of Public and Indian Housing)

To comply with HOTMA, PHAs must be able to submit transactions to the Housing Information Portal (HIP). This requires the PHA's software vendor to make system updates and fully convert to making all submissions to HIP. Each PHA will set its own compliance date as early as January 1, 2024, but no later than January 1, 2025. "Compliance" means, in this instance, utilizing the HOTMA rules as it applies to the affected programs and corresponding reporting in HIP.

On July 3, 2024, HUD sent an email to the PHA Directors stating that HUD has rescinded Notice PIH 2024-12 entitled "Housing Information Portal Implementation" and will issue more guidance once the HIP Implementation schedule. HUD also announced that HOTMA may be delayed, future guidance will be released regarding a timeline for compliance with section 102 and 104. Additionally, HUD advised PHAs not to begin conducting reexaminations under HOTMA rules without further information on when the HOTMA c-compliant HUD-50058 in HIP will be available.

HACSD Policy

HACSD's compliance date for HOTMA is contingent upon further guidance from HUD. HOTMA policies will not be applied to any type of certification until a compliance date is established by HUD.

The following sections in this exhibit have been updated to reflect the HOTMA regulatory changes and HACSD policy. Updated sections are underlined.

HOTMA Update: Chapter 3, Section 3-I.B.; 24 CFR 5.403; 982.201 (c)

- Update: Definition of family to include transition aged youth.
- Description of Change: Added youth as new category of single person

3-I.B. FAMILY AND HOUSEHOLD

[24 CFR 982.201(C); FR Notice 02/03/12; Notice PIH 2014-20]

The terms family and household have different meanings in the HCV program.

Family

To be eligible for assistance, an applicant must qualify as a family. Family as defined by HUD include, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older; or a group of persons residing together. Such group includes but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual Orientation means homosexuality, heterosexuality, or bisexuality.

HACSD Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.

The HACSD will include a registered domestic partnership, as recognized by state law, in the definition and all references to marriage outlined in this Plan.

Each family must identify the individuals to be included in the family at the time of application and must notify HACSD if the family's composition changes.

Household

Household is a broader term that includes additional people who, with PHA permission, live in an assisted unit, such as live-in aides, foster children and foster adults.

HOTMA Update: Chapter 3, Section 3-I.K.; 24 CFR 5.609

- Update: Definition: Foster adult and child
- Description of Change: Added a state law component to the definition

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

A *foster adult* is a member of the household who is 18 years of age or older and meets the definition of a foster adult under State law. In general, this usually includes persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609].

A *foster child* is a member of the household who meets the definition of a foster child under State law. In general, a foster child is placed with the family by an authorized placement agency or by court order.

Foster children and foster adults who are living with an applicant or who have been approved by the PHA to live with a participant family are considered household members but not family members. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].

HACSD Policy

A foster child is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in a violation of HQS space standards according to 24 CFR 982.401.

Documentation must be submitted to verify the identity of the foster children/adults, to confirm they are foster children/adults, to confirm the foster children/adults are legal U.S. residents and the benefits are paid on behalf of the foster children/adults.

Foster children/adults are not subject to non-citizen rule requirements, but the placement agency must confirm they are legal U.S. residents.

A streamlined documentation process is acceptable for foster children/adults expected to be in the household for a short period of time. Foster children/adults expected to be in the household at least one year are considered a part of the family in determining the subsidy standards and income limits.

The criminal history of adult foster children must be verified prior to admission to the household and whenever the criminal history of adult family members is reviewed. Adult foster children must sign release of information forms so that criminal history can be verified.

Foster children/adults may not be considered remaining members of the tenant family.

HOTMA Update: Chapter 3, Section 3-I.L.

- Update: Remaining household member section
- Description of change: Update reference to medical expense

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons including educational activities, placement in foster care, employment, illness, incarceration, and court order.

Family Members Permanently Confined for Medical Reasons [HCV GB]

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB].

HACSD Policy

An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If a family member leaves the household to enter a facility such as a hospital, nursing home, or rehabilitation center, the HACSD will require verification from a reliable, qualified source as to the likelihood of their return, and the anticipated **length** of their absence.

Sole Family Member

If the verification indicates the sole family member is permanently confined to a nursing home, s/he will be considered permanently absent, and assistance will be terminated. If the verification indicates the sole family member may return in less than 180 consecutive days or is unsure when the sole family member will return, the family member may be considered temporarily absent.

Remaining Household Member

If a family member is confined to a hospital or nursing home for an indefinite duration, and there is a family member left in the household, the HACSD will calculate the lower family rent by comparing the following methods:

- Exclude the income of the person confined to the nursing home, give the family no deductions for the health and medical care expenses of the confined family **member**, and review and reduce the family's voucher size, if appropriate; or
- Include the income of the person confined to the nursing home and give the family the medical deductions allowable on behalf of the person in the nursing home.

HOTMA Update: Chapter 3, Section 3-III.B.; 24 CR 5.618; 982.552 (b)(6)

- Update: Mandatory denial due to limit on net assets and property ownership
- Description of Change: Added citation, added asset restriction to mandatory denial list

3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.552(b)(6); 24 CFR 982.553(a)]

HUD requires the PHA to deny assistance in the following cases:

- Households are subject to the restrictions on net assets and property ownership as required by 24 CFR 5.618 and as outlined in Chapter 6 of this Plan.
- Any member of the household has been evicted from federally-assisted housing in the last 3 years for drug-related criminal activity, beginning on the date of the eviction. HUD permits, but does not require, the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household).

HACSD Policy

The HACSD may admit the applicant, if after considering the individual circumstances of the household, the HACSD determines that:

- Full restitution, including the cost of eviction, was made to the landlord, if lease violations occurred as a result of the criminal activity; and
- The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by the HACSD; or
- The circumstances leading to eviction no longer exist because the criminal household member has died.
- The criminal household member is no longer in the household and the head of household has certified that the criminal family member will never be allowed to return to visit the family. The head of household must certify that s/he understands that if the criminal family member is allowed to return to visit, the family's program participation will be terminated.

The HACSD may waive the prohibition of program admission for drug-related criminal activity for personal use or a pattern of alcohol abuse, if:

- The person demonstrates successful completion of a credible rehabilitation program approved by the HACSD, or evidence of otherwise having been rehabilitated, and the violation did not occur while the family was being assisted.

HOTMA Update: Chapter 4, Section 4-111.F.; 24 CFR 982.552 (b) (6)

- Update: Added asset denial to waitlist eligibility determinations
- Description of change: Families whose net countable assets exceed the asset limit will be denied admission, removed from the waitlist, and offered an informal review

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted funding admission, or selection preference that affected the order in which the family was selected from the waiting list.

HACSD Policy

Eligibility processing for a family selected from the waiting list is based on the information provided on the eligibility declaration, the supporting documents submitted and independent verification by the HACSD. The family must be eligible for the preferences it has claimed, income limits and targeting, and jurisdiction priority as of the date it was pulled off the waiting list.

A family change in circumstances after the date the family was selected from the waiting list for eligibility processing will not be evaluated for a possible change in preference status, jurisdiction, income limits and targeting, unless the family change in circumstances prior to voucher issuance results in the family's income exceeding 50% of area median income (AMI), in which case the family must be denied program admission.

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months, in accordance with the HACSD's interim policy, unless the additions are due to birth, adoption, marriage or registered domestic partnership, court-awarded custody, return of minor or disabled children, or elderly or disabled dependents to the household.

Applicants consisting of two families living together who apply together, (such as a mother and father with a daughter and her husband and/or children) will be treated as a family unit and are eligible for one voucher.

Income Changes During the Application Process:

Scenario Number One

A family met admission preferences and income targeting requirements as of the point of time of being selected from the waiting list, but during the full application process, the family moved outside of the HACSD's jurisdiction. The family may continue to be processed for admission.

Scenario Number Two

A family was over 50% AMI at the time it was selected from the waiting list, but then the income was reduced as a result of termination of employment. The family must be

denied as being over income at the time it was pulled from the waiting list and must reapply.

Scenario Number Three

A family was at or below 30% AMI at the time it was selected from the waiting list. Then its income increased to over 30% of AMI, but at or below 50% of AMI, prior to completion of the full application and issuance of the voucher. The family met the income targeting requirements when it was pulled from the waiting list and is still income-eligible at completion of the full application and issuance of the voucher, so the family may be processed for admission.

Scenario Number Four

The family was income-eligible at the time it was selected from the waiting list but started working prior to the completion of the full application, which resulted in the family's income exceeding 50% of the AMI. The family must be denied as over-income and future changes in the family's circumstances cannot be considered; e.g., the family member quits their job. The family must reapply to the waiting list.

Scenario Number Five

The family's income increases after it was issued a voucher. The income increase will be handled in accordance with the HACSD's current interim policy.

Determination of Eligibility

After the verification process is completed, the HACSD will make a final determination of eligibility [24 CFR 982.201]. This decision is based on information provided by the family, third-party documents, HACSD research, and the current eligibility criteria in effect. If the family is determined to be eligible, the HACSD will mail a notification of a scheduled briefing. The purpose of the briefing is to issue the voucher and orient the family to the program.

If the HACSD determines that the family is ineligible, the HACSD will send written notification of the ineligibility determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review (Chapter 16).

Families whose annual income exceeds the income limit will be denied admission, removed from the waiting list, and offered an informal review.

Families whose net countable assets exceed the asset limit will be denied admission, removed from the waiting list, and offered an informal review.

Ownership of ne family assets that exceed \$100,000, which will be adjusted annually by HUD, or ownership interest in disqualifying real property will be denied admission, removed from the waiting list and offered an informal review.

The household found not eligible to be processed for assistance will be mailed a notice explaining why and outlining their right to request an informal review within 14 days.

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be

returned to its original position on the waiting list. The HACSD will notify the family in writing that it has been returned to the waiting list and will specify the reasons for it. If the HACSD determines that the family is eligible to receive assistance, the HACSD will invite the family to attend a briefing in accordance with the policies in Chapter 5.

HOTMA Update: Chapter 6, Replaced whole chapter

Chapter 6 – INCOME AND SUBSIDY DETERMINATIONS
[24 CFR Part 5, Subparts E and F; 24 CFR 982]

INTRODUCTION

A family's income determines eligibility for assistance and is also used to calculate the family's payment and the PHA's subsidy. The PHA will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

Part I: Annual Income. HUD regulations specify the sources of income which are excluded from the family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.

Part II: Assets. HUD regulations specify the types of assets which are excluded from a family's annual income. These requirements and PHA policies for calculating income from assets are found in Part II.

Part III: Adjusted Income. Once annual income has been established, HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies and allow the PHA to adopt additional permissive deductions. These requirements and PHA policies for calculating adjusted income are found in Part III.

Part IV: Calculating Family Share and PHA Subsidy. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining PHA subsidy and required family payment.

PART I: ANNUAL INCOME

6-I.A. OVERVIEW [24 CFR 5.609]

Annual income includes:

- All amounts, not specifically excluded in 24 CFR 5.609(b);
- All amounts received from all sources (other than those specifically excluded in 24 CFR 5.609(b)) by each member of the family who is 18 years of age or older or is the head of household or spouse;
- Unearned income (other than those sources specifically excluded in 24 CFR 5.609(b)) by or on behalf of each dependent who is under 18 years of age; and
- Imputed returns of an asset based on the current passbook savings rate, as determined by HUD, when the value of net family assets exceeds \$50,000 (which amount HUD will adjust annually) and the actual returns from a given asset cannot be calculated.

In addition to this general definition, the regulations at 24 CFR 5.609(b) provide a comprehensive listing of all sources of income that are excluded from annual income. Note, unlike in previous versions of the regulations, the current regulations governing annual income do not list sources of income that are to be included. Instead, HUD relies on the definition of excluded income under 24 CFR 5.609(b) to provide the scope of what is included. To that end, generally, all income is included unless it is specifically excluded by regulation.

Annual income includes “all amounts received,” not the amount that a family may be legally entitled to receive but did not receive. For example, a family’s child support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders [Notice PIH 2023-27].

Annual income also includes all actual anticipated income from assets (provided the income is not otherwise excluded) even if the asset itself is excluded from net family assets [Notice PIH 2023-27]. 24 CFR 5.603(b)(1) describes HUD regulations for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Full Definition (Exhibit 6-1)
- Treatment of Family Assets (Exhibit 6-2)
- The Effect of Welfare Benefit Reduction (Exhibit 6-3)

Sections 6-I.B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. Verification requirements for annual income are discussed in Chapter 7.

6-I.B. HOUSEHOLD COMPOSITION AND INCOME

Overview

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition in accordance with HUD regulations and PHA policies in Chapter 11. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-in aides	Income from all sources (both earned and unearned) is excluded [24 CFR 5.609(b)(8)].
Foster child or foster adult	Income from all sources (both earned and unearned) is excluded [24 CFR 5.609(b)(8)].
Head, spouse, or cohead Other adult family members	All sources of income not specifically excluded by the regulations are included [24 CFR 5.609(a)].
<u>Minors</u>	Earned income of children under 18 years of age is excluded [24 CFR 5.609(b)(3)]. All sources of unearned income, except those specifically excluded by the regulations, are included [24 CFR 5.609(a)].
Full-time students 18 years of age or older (not head, spouse, or cohead)	<u>Earned income in excess of the dependent deduction is excluded</u> [24 CFR 5.609(b)(14)]. All sources of unearned income, except those specifically excluded by the regulations, are included.

HACSD Policy

For admission, an unborn child is not considered when determining the income limits. For example, a pregnant single person is considered a one-person household when determining the income limits. To determine if the family is income-eligible for admission, the HACSD compares the annual income of the family to the applicable income limit for the family's size. Newly admitted families who exercise portability prior to receiving initial assistance must be within the applicable income limit of the receiving PHAs. This requirement does not include those who had been participants with the initial PHA.

Temporarily Absent Family Members

The current regulations governing annual income do not specifically address temporarily absent family members. The regulations also do not define “temporarily” or “permanently” absent or specify a timeframe associated with a temporary versus a permanent absence.

HACSD Policy

Unless specifically excluded by the regulations, the income of all family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit.

The HACSD must count all applicable income of every family member who is on the lease, including those who are temporarily absent. In addition, the HACSD must count the income of the spouse, co-head or the head of household, if that person is temporarily absent, even if that person is not on the lease. The income of a permanently absent spouse who was previously in the assisted household will be counted unless the family has filed for a divorce or legal separation.

Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be

considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

HACSD Policy

Full-time students who attend school away from the home will be treated in the following manner:

A student (other than head of household, spouse or co-head) who attends school away from home, but lives with the family during school recesses may, depending on the circumstances, be considered either temporarily or permanently absent. If the family member is considered permanently absent, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of voucher size.

Students who are out of the home more than 50 percent of the year are considered permanently absent, unless they are in boarding school, school dormitories, or temporarily staying with family or friends without a lease or rental agreement.

Absences Due to Placement in Foster Care

Children temporarily absent from the home as a result of placement in foster care (as confirmed by the state child welfare agency) are considered members of the family [24 CFR 5.403].

HACSD Policy

If a child has been placed in foster care, the HACSD will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will continue to be counted as a family member.

If the children have been removed permanently, the voucher size will be reviewed and reduced, if appropriate.

Absent Head, Spouse, or Cohead

HACSD Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Absence of Any Member

HACSD Policy

A member of the household is considered permanently absent if the household member is away from the unit for six consecutive months or more in a 12-month period, except as otherwise provided in this Chapter. A sole member is considered permanently absent if absent from the unit for 30 consecutive days. A sole member may be granted an extension of up to 180 consecutive days for medical reasons, as a reasonable accommodation for a disability, or a family emergency.

If a member of the household is subject to a court order that restricts him/her from the home for more than six months, the person will be considered permanently absent.

Family Members Permanently Confined for Medical Reasons

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB, p. 5-22].

HACSD Policy

If a family member leaves the household to enter a facility such as a hospital, nursing home, or rehabilitation center, the HACSD will require verification from a reliable, qualified source as to the likelihood of their return, and the anticipated length of their absence.

If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or cohead qualifies as an elderly person or a person with disabilities.

Joint Custody of Dependents

HACSD Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.

In cases where there is no court-awarded custody of a minor child or children due to the absence of the parent or legal guardian of the child and the child is living with the assisted family, the HACSD will apply the preponderance of evidence standard to determine if the family has physical custody of the minor child or children. The HACSD will accept documentation including, but not limited to, school records, public assistance payments and notarized sworn statements that demonstrate that the assisted family has actual physical custody of the minor child or children.

Preponderance of evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not.

Caretakers for a Child

HACSD Policy

The approval of a caretaker is at the owner and PHA's discretion and subject to the owner and PHA's screening criteria. If neither a parent nor a designated guardian remains in a household receiving HCV assistance, the PHA will take the following actions.

- (1) When the courts or a social service agency have determined that another adult is to be brought into the assisted unit to care for the children for an indefinite period, in instances when the parents have vacated, the HACSD will treat that adult as a visitor for the first 180 days. During the time the caretaker is considered a visitor, the caretaker's income will not be counted, nor deductions allowed.

- (2) After 180 days, if the court awards custody or legal guardianship to the caretaker, the voucher will be transferred to the caretaker, providing the caretaker meets all eligibility criteria for household additions. At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.
- (3) If there is court action to award custody of legal guardianship to the caretaker, the voucher will be transferred to the caretaker, providing the caretaker meets all eligibility criteria for household additions.
- (4) The HACSD will transfer the voucher to the caretaker, in the absence of a court order, if the caretaker has been in the unit for more than 12 months, and it is reasonable to expect custody to be granted.
- (5) If custody is awarded for a limited time, the HACSD will state in writing that the transfer of the voucher is for a limited time, according to the period the caretaker has custody of the children.
- (6) Once the caretaker is approved by the HACSD and no longer considered a visitor, the income of the caretaker will be counted, and deductions will be allowed.

A legal parent who able to assume the responsibilities of the head of household may be added to the household and is not considered a visitor. Income and deductions are considered. See Chapter 3-I.C.

6-I.C. CALCULATING ANNUAL INCOME

The methodology used for calculating income differs depending on whether income is being calculated at initial occupancy, interim reexamination, or at annual reexamination. However, income from assets is always anticipated regardless of certification type.

Anticipating Annual Income [24 CFR 5.609(c)(1)]

At initial occupancy and for an interim reexamination of family income, the PHA is required to use anticipated income (current income) for the upcoming 12-month period following the new admission or interim reexamination effective date. Policies related to verifying income are found in Chapter 7.

HACSD Policy

When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), the PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.

Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.

In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.

Known Changes in Income

If the PHA verifies an upcoming increase or decrease in income, annual income will be projected by applying each income amount to the appropriate part of the 12-month period.

Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the new admission or interim reexamination. In such a case the PHA would calculate annual income as follows: $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$.

The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then, should the change in income require the PHA to conduct an interim reexamination, conduct an interim reexamination in accordance with PHA policy in Chapter 11.

Calculating Annual Income at Annual Reexamination [24 CFR.609(c)(2); Notice PIH 2023-27]

At annual reexamination, PHAs must first determine the family's income for the previous 12-month period and use this amount as the family income for annual reexaminations; however, adjustments to reflect current income must be made. Any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination of family income in accordance with PHA policies in Chapter 11 and HUD regulations, must be considered. If, however, there have been no changes to income, then the amount of income calculated for the previous 12-month period is the amount that will be used to determine the family's rental assistance. Income from assets is always anticipated, irrespective of the income examination type. Policies related to conducting annual reexaminations are located in Chapter 11.

HACSD policy

Step 1:

During annual reexaminations except where HACSD uses a streamlined income determination, HACSD must first determine the family's income for the previous 12-month period; however, adjustments to reflect current income must be made.

If there have been no changes to income., then this is the amount that will be used to determine the family's rental assistance.

HACSD reviews the following information to determine prior-year income:

- EIV Income Report (must be pulled within 120 days of the effective date of the annual reexamination)
- The income reported on the most recent reexamination HUD-50058/HUD-50059 and
- What the family certified on current recertification booklet for prior year income

Step 2:

Take into consideration any interim reexamination of family income completed since the last annual reexamination.

- If an interim reexamination was performed within the reexamination cycle and there are NO additional changes, HACSD must use the annual income from the interim reexamination to determine the family's rental assistance.
- If HACSD did not perform an interim reexamination, move to Step 3.

Step 3:

If there were changes in annual income not processed by HACSD since the last reexamination, use current income.

6-I.D. EARNED INCOME

Wages and Related Compensation [24 CFR 5.609(a); Notice PIH 2023-27]

The earned income of each member of the family who is 18 years of age or older, or who is the head of household or spouse/cohead regardless of age, is included in annual income. Income received as a day laborer or seasonal worker is also included in annual income, even if the source, date, or amount of the income varies [24 CFR 5.609 (b)(24)].

Earned income means income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. Earned income does not include any pension or annuity, transfer payments (meaning payments made or income received in which no goods or services are being paid for, such as welfare, social security, and governmental subsidies for certain benefits), or any cash or in-kind benefits [24 CFR 5.100].

A *day laborer* is defined as an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future [24 CFR 5.603(b)].

A *seasonal worker* is defined as an individual who is hired into a short-term position (e.g., for which the customary employment period for the position is six months or fewer) and the employment begins about the same time each year (such as summer or winter). Typically, the individual is hired to address seasonal demands that arise for the particular employer or industry [24 CFR 5.603(b)]. Some examples of seasonal work include employment limited to holidays or agricultural seasons. Seasonal work may include but is not limited to employment as a lifeguard, ballpark vendor, or snowplow driver [Notice PIH 2023-27].

HACSD Policy

The PHA will include in annual income the full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation.

For regularly received bonuses and/or commission, the HACSD will verify and average amounts received for one-year preceding admission or reexamination, unless the family can provide credible documentation indicating the historical information is incorrect.

If a new employee has not yet received any bonuses or commissions, the PHA will count only the amount estimated by the employer. The file will be documented appropriately.

Military Pay

All regular pay, special pay and allowances of a member of the Armed Forces are counted except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(b)(11)].

Earnings of a Minor [24 CFR 5.609(b)(3)]

A minor is a member of the family, other than the head of household or spouse, who is under 18 years of age. Employment income earned by minors is not included in annual income. All other sources of unearned income, except those specifically excluded by the regulations, are included.

Earned Income of Full-Time Students [24 CFR 5.609(b)(14)]

The earned income of a dependent full-time student in excess of the amount of the dependent deduction is excluded from annual income. All sources of unearned income, except those specifically excluded by the regulations, are included.

A family member other than the head of household or spouse/cohead is considered a full-time student if they are attending school or vocational training on a full-time basis [24 CFR 5.603(b)]. To be considered “full-time,” a student must be considered “full-time” by an educational institution with a degree or certificate program [HCV GB, p. 5-29].

6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES [24 CFR 5.617; Streamlining Final Rule (SFR) Federal Register 3/8/16; Notice PIH 2023-27]

HOTMA removed the statutory authority for the EID. The EID is available only to families that are eligible for and participating on the program as of December 31, 2023, or before; no new families may be added on or after January 1, 2024. If a family is receiving the EID prior to or on the effective date of December 31, 2023, they are entitled to the full amount of the benefit for a full 24-month period. The policies below are applicable only to such families. No family will still be receiving the EID after December 31, 2025. The EID will sunset on January 1, 2026, and the PHA policies below will no longer be applicable as of that date or when the last qualifying family exhausts their exclusion period, whichever is sooner.

Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member’s current income with their “baseline income.” The family member’s baseline income is their income immediately prior to qualifying for the EID. The family member’s baseline income remains constant throughout the period that they are participating in the EID.

Calculation Method

Initial 12-Month Exclusion

During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.

HACSD Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion

During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.

HACSD Policy

During the second 12-month exclusion period, the HACSD will exclude 50 percent of any increase in income attributable to new employment or increased earnings. ***Lifetime Limitation***

The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they begin to receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance. The EID will sunset on January 1, 2026. In no circumstances will a family member's exclusion period continue past January 1, 2026.

6-I.F. BUSINESS AND SELF-EMPLOYMENT INCOME [24 CFR 5.609(b)(28); Notice PIH 2023-27]

Annual income includes "net income from the operation of a business or profession. *Net income* is gross income minus business expenses that allows the business to operate. *Gross income* is all income amounts received into the business, prior to the deduction of business expenses.

Expenditures for business expansion or amortization of capital indebtedness may not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family."

HACSD Policy

To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described herein.

Independent Contractors

Income received as an independent contractor is included in annual income, even if the source, date, or amount of the income varies [24 CFR 5.609 (b)(24)].

An *independent contractor* is defined as an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code Federal income tax requirements and whose earnings are consequently subject to the Self-Employment Tax. In general, an individual is an independent contractor if the payer has the right to control or direct only the result of the work and not what will be done and how it will be done [24 CFR 5.603(b)].

Business Expansion

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

HACSD Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered

a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

HACSD Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

HACSD Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of an assisted family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid. Investments do not include the value of labor contributed to the business without compensation.

Co-owned Businesses

HACSD Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

Assets Owned by a Business Entity

If a business entity (e.g., limited liability company or limited partnership) owns the asset, then the family's asset is their ownership stake in the business, not some portion of the business's assets. However, if the family holds the assets in their own name (e.g., they own one-third of a restaurant) rather than in the name of a business entity, then the percentage value of the asset owned by the family is what is counted toward net family assets (e.g., one-third of the value of the restaurant) [Notice PIH 2023-27].

6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27]

Introduction

Section 479B of the Higher Education Act of 1965 (Title IV of the HEA) requires that all assistance under Title IV of the HEA and Bureau of Indian Affairs student financial assistance, even assistance provided to students in excess of tuition and required fees or charges, be excluded from HUD income calculations.

For Section 8 programs only, however, for over 10 years through FY 2022, HUD appropriations have included a provision that for certain students receiving Section 8 assistance, any amounts received in excess of tuition and any other required fees and charges are considered income (with the exception of students who lived with their parents or who were over the age of 23 with a dependent child).

While the language in various consolidated appropriations acts is limited to federal fiscal year covered by the act, this does not rule out the possibility that similar language will be included in future years' appropriations bills.

- For any funds from a year where HUD's appropriations acts include this limitation, it will apply with respect to Section 8 participants. The PHA will follow the pre-HOTMA Section 8 student financial assistance limitation described below.
- During years in which an appropriations act does not contain this Section 8 student financial assistance limitation (or any other such limitation), then the determination of student financial assistance as included/excluded income for all Section 8 students defaults to the methodology described for the public housing program and listed below.

Pre-HOTMA Section 8 Student Financial Assistance Limitation [FR 4/10/06; Notice PIH 2015-21]

In 2005, Congress passed a law (for Section 8 programs only) requiring that certain student financial assistance be included in annual income. Prior to that, the full amount of student financial assistance was excluded. For some students, the full exclusion still applies.

The regulation requiring the inclusion of certain student financial assistance applies only to students who satisfy all of the following conditions:

- They are enrolled in an institution of higher education, as defined under the Higher Education Act (HEA) of 1965.
- They are seeking or receiving Section 8 assistance on their own—that is, apart from their parents—through the HCV program, the project-based voucher program, or the moderate rehabilitation program.
- They are under 24 years of age **OR** they have no dependent children.

For students who satisfy these three conditions, any financial assistance in excess of tuition and any other required fees and charges received: (1) under the 1965 HEA, (2) from a private source, or (3) from an institution of higher education, as defined under the 1965 HEA, must be included in annual income.

To determine annual income in accordance with the above requirements, the PHA will use the definitions of *dependent child*, *institution of higher education*, and *parents* in Chapter 3, along with the following definitions [FR 4/10/06, pp. 18148-18150]:

- *Assistance under the Higher Education Act of 1965* includes Pell Grants, Federal Supplement Educational Opportunity Grants, Academic Achievement Incentive

Scholarships, State Assistance under the Leveraging Educational Assistance Partnership Program, the Robert G. Byrd Honors Scholarship Program, and Federal Work Study programs.

- *Assistance from private sources* means assistance from nongovernmental sources, including parents, guardians, and other persons not residing with the student in an HCV assisted unit.
- *Tuition and fees* are defined in the same manner in which the Department of Education defines *tuition and fees* [Notice PIH 2015-21].
 - This is the amount of tuition and required fees covering a full academic year most frequently charged to students.
 - The amount represents what a typical student would be charged and may not be the same for all students at an institution.
 - If tuition is charged on a per-credit-hour basis, the average full-time credit hour load for an academic year is used to estimate average tuition.
 - Required fees include all fixed-sum charges that are required of a large proportion of all students. Examples include, but are not limited to, writing and science lab fees and fees specific to the student's major or program (i.e., nursing program).
 - Expenses related to attending an institution of higher education must **not** be included as tuition. Examples include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed-sum charges.

Any student financial assistance not subject to inclusion under the regulations is fully excluded from annual income, whether it is paid directly to the student or to the educational institution the student is attending. This includes any financial assistance received by:

- Students residing with parents who are seeking or receiving Section 8 assistance
- Students who are enrolled in an educational institution that does **not** meet the 1965 HEA definition of *institution of higher education*
- Students who are over 23 **AND** have at least one dependent child, as defined in section 3-II.E
- Students who are receiving financial assistance through a governmental program not authorized under the 1965 HEA.

HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)]

The regulations under HOTMA distinguish between two categories of student financial assistance paid to both full-time and part-time students.

Types of Assistance

Any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)].

Examples of assistance under title IV of the HEA include:

- Federal Pell Grants;
- Teach Grants;
- Federal Work Study Programs;

Housing Authority of the County of San Diego

- Federal Perkins Loans;
- Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA); or
- Bureau of Indian Affairs/Education student assistance programs
 - The Higher Education Tribal Grant
 - The Tribally Controlled Colleges or Universities Grant Program

Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education not otherwise excluded by the Federally mandated income exclusions are excluded [24 CFR 5.609(b)(9)(ii)]. *Actual covered costs* are defined as the actual costs of:

- Tuition, books, and supplies;
 - Including supplies and equipment to support students with learning disabilities or other disabilities
- Room and board; and
- Other fees required and charged to a student by the education institution.

For a student who is not the head of household or spouse/cohead, actual covered costs also include the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

Further, to qualify, other student financial assistance must be expressly:

- For tuition, book, supplies, room and board, or other fees required and charged to the student by the educational institution;
- To assist a student with the costs of higher education; or
- To assist a student who is not the head of household or spouse with the reasonable and actual costs of housing while attending the educational institution and not residing in an assisted unit.

The student financial assistance may be paid directly to the student or to the educational institution on the student's behalf. However, any student financial assistance paid to the student must be verified by the PHA.

The financial assistance must be a grant or scholarship received from:

- The Federal government;
- A state, tribal, or local government ;
- A private foundation registered as a nonprofit;
- A business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or
- An institution of higher education.

Student financial assistance, does not include:

- Financial support provided to the student in the form of a fee for services performed; (e.g., a work study or teaching fellowship that is not excluded under section 479B of the Higher Education Act HEA);

- Gifts, including gifts from family or friends; or
- Any amount of the scholarship or grant that, either by itself or in combination with assistance excluded under the HEA, exceeds the actual covered costs of the student.

Calculating Income from Student Financial Assistance [HOTMA Student Financial Assistance Resource Sheet; Notice PIH 2023-27]

The formula for calculating the amount of other student financial assistance that is excluded from income always begins with deducting the assistance received under 479B of the HEA from the total actual covered costs, because the 479B assistance is intended to pay the student's actual covered costs. When a student receives assistance from both Title IV of the HEA and from other sources, the assistance received under Title IV of the HEA must be applied to the student's actual covered costs first and then other student financial assistance is applied to any remaining actual covered costs. Once actual costs are covered, any remaining student financial assistance is considered income.

HACSD Policy

If a student only receives financial assistance under Title IV of the HEA and does not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case.

If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of financial assistance in excess of the student's actual covered costs in the family's annual income.

Example 1

- Actual covered costs: \$20,000
- Other student financial assistance: \$25,000
- Excluded income: \$20,000 (\$25,000 in financial assistance - \$20,000 in actual covered costs)
- Included income: \$5,000

When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the other student financial assistance will be applied to any remaining actual covered costs.

If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance” would be excluded from income.

Example 2

- Actual covered costs: \$25,000
- Title IV HEA assistance: \$26,000
- Title IV HEA assistance covers the students entire actual covered costs.
- Other Student Financial Assistance: \$5,000
- Excluded income: The entire Title IV HEA assistance of \$26,000
- Included income: All other financial assistance of \$5,000

If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs.

Example 3

- Actual covered costs: \$22,000
- Title IV HEA assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$7,000 (\$22,000 in actual covered costs - \$15,000 in Title IV HEA assistance).
- Other Student Financial Assistance: \$5,000
- \$7,000 in remaining actual covered costs - \$5,000 in other financial assistance
- Excluded income: \$15,000 entire amount of the Title IV HEA Assistance + \$5,000 in other financial assistance
- Included income: \$0

Example 4

- Actual covered costs: \$18,000
- Title IV HEA Assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$3,000 (\$18,000 in actual covered costs - \$15,000 in Title IV HEA Assistance)
- Other student Financial Assistance: \$5,000
- When other student financial assistance is applied, financial assistance exceeds actual covered costs by \$2,000 (\$3,000 in actual covered costs - \$5,000 in other financial assistance).
- Included income: \$2,000 (the amount by which the financial aid exceeds the student's actual covered costs).

6-I.H. PERIODIC PAYMENTS

Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are not included in annual income. Regulations do not specify which types of periodic payments are included in annual income.

Income that has a discrete end date and will not be repeated beyond the coming year is excluded from a family's annual income because it is nonrecurring income. However, this does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that can be extended. For example, a family receives income from a guaranteed income program in their city that has a discrete beginning and end date. While the guaranteed income will be repeated in the coming year, it will end before the family's next annual reexamination. This income is fully excluded from annual income.

Insurance payments and settlements for personal or property losses, including but not limited to payments under health insurance, motor vehicle insurance, and workers' compensation, are excluded from annual income. However, periodic payments paid at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that are received in lieu of wages for workers' compensation are included in annual income. Payments received in lieu of wages for worker's compensation are excluded, even if paid in periodic payments, if the income will last for a period of less than one year.

Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]

Deferred periodic amounts from Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs (VA) disability benefits that are received in a lump sum amount or in prospective monthly amounts are excluded from annual income.

HACSD Policy

The PHA will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.

When a delayed-start payment is received that is to be included and the family reports this during the period in which the PHA is processing an annual reexamination, the PHA will adjust the family's rent retroactively for the period the payment was intended to cover.

If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family's next annual recertification.

Retirement Accounts [24 CFR 5.609(b)(26); Notice PIH 2023-27]

Income received from any account under a retirement plan recognized as such by the IRS, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals is not considered actual income from assets.

However, any distribution of periodic payments from such accounts is included in annual income at the time they are received by the family.

An asset moved to a retirement account held by a member of the family is not considered to be an asset disposed of for less than fair market value.

Social Security Benefits [Notice PIH 2018-24]

The PHA is required to use the gross benefit amount to calculate annual income from Social Security benefits.

Annually in October, the Social Security Administration (SSA) announces the cost-of-living adjustment (COLA) by which federal Social Security 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 the SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1 or later of the upcoming year [Notice PIH 2023-27]. When a family member's benefits are garnished, levied, or withheld to pay restitution, child support, tax debt, student loan debt, or other debts, the PHA must use the gross amount of the income, prior to the reduction, to determine a family's annual income.

HACSD Policy

Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but which they do not receive. When the SSA overpays an individual, resulting in a withholding or deduction from their benefit amount until the overpayment is paid in full, the PHA will use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount.

Alimony and Child Support

Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but which they do not receive. For example, a family's child-support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders [Notice PIH 2023-27].

HACSD Policy

The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement.

The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made.

In order to verify that payments are not being made, the PHA will review child support payments over the last three months.

If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.

At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income.

If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income.

If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.

6-I.I. NONRECURRING INCOME [24 CFR 5.609(b)(24) and Notice PIH 2023-27]

Income received as an independent contractor, day laborer, or seasonal worker is not excluded from income as nonrecurring income, even if the source, date, or amount of the income varies.

Income that has a discrete end date and will not be repeated beyond the coming year during the family's upcoming annual reexamination period will be excluded from a family's annual income as nonrecurring income. This exclusion does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that can be extended.

Income amounts excluded under this category may include, but are not limited to:

- Nonrecurring payments made to the family or to a third party on behalf of the family to assist with utilities;
- Payments for eviction prevention;
- Security deposits to secure housing;
- Payments for participation in research studies (depending on the duration); and
- General one-time payments received by or on behalf of the family.

Nonrecurring income that is excluded under the regulations includes:

- Payments from the U.S. Census Bureau for employment (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not culminating in permanent employment [24 CFR 5.609(b)(24)(i)].
- Direct federal or state payments intended for economic stimulus or recovery [24 CFR 5.609(b)(24)(ii)].
- Amounts directly received by the family as a result of state refundable tax credits or state or federal tax refunds at the time they are received [24 CFR 5.609(b)(24)(iii) and (iv)].
- Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding gifts, baby showers, anniversaries) [24 CFR 5.609(b)(24)(v)].
- Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization [24 CFR 5.609(b)(24)(vi)]. When calculating annual income, PHAs are prohibited from assigning monetary value to such non-monetary in-kind donations received by the family [Notice PIH 2023-27]. Non-recurring, non-monetary in-kind donations from friends and family are excluded as non-recurring income.
- Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings [24 CFR 5.609(b)(24)(vii)]. However, the value of regular in-kind donations (such as the value of groceries) received by friends and family are included.

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments.

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-3. The requirements are summarized below. This rule applies only if a family was receiving HCV assistance at the time the sanction was imposed.

Covered Families

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

Imputed Income

When a welfare agency imposes a sanction that reduces a family’s welfare income because the family commits fraud or fails to comply with the agency’s economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency provide the reason for the reduction of benefits and the amount of the reduction of benefits. The imputed welfare income is the amount that the benefits were reduced as a result of the sanction.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

Offsets

The amount of the imputed welfare income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

HACSD Policy

Verification Before Denying a Request to Reduce Family Rent

The HACSD will obtain a written, faxed, computer, or telephone verification from the welfare agency stating that the family’s benefits have been reduced for fraud or noncompliance with economic self-sufficiency/work activities requirements, before denying a family’s request for reduction of family rent. The requested verification from the welfare agency must state the amount, term, and reason for the benefit reduction.

Cooperation Agreements

The HACSD has a cooperation agreement in place with the local welfare agency. The HACSD has access to the welfare agency's database and can search welfare participant records. In addition, the HACSD has a verbal cooperation agreement with the local welfare agency for verbal confirmation of a family's sanction status.

Family Dispute of Amount of Imputed Welfare Income

If the family disputes the amount of imputed income and the HACSD denies the family's request to modify the amount, the HACSD will provide the tenant with a notice of denial, which will include:

- An explanation for the HACSD's determination of the amount of imputed welfare income
- Opportunity to request an informal hearing

6-I.K. STATE PAYMENTS TO ALLOW INDIVIDUALS WITH DISABILITIES TO LIVE AT HOME [24 CFR 5.609(b)(19)]

Payments made by or authorized by a state Medicaid agency (including through a managed care entity) or other state or federal agency to an assisted family to enable a member of the assisted family who has a disability to reside in the family's assisted unit are excluded.

Authorized payments may include payments to a member of the assisted family through state Medicaid-managed care systems, other state agencies, federal agencies or other authorized entities.

The payments must be received for caregiving services a family member provides to enable another member of the assisted family who has a disability to reside in the family's assisted unit. Payments to a family member for caregiving services for someone who is not a member of the assisted family (such as for a relative that resides elsewhere) are not excluded from income.

Furthermore, if the agency is making payments for caregiving services to the family member for an assisted family member and for a person outside of the assisted family, only the payments attributable to the caregiving services for the caregiver's assisted family member would be excluded from income.

6-I.L. CIVIL RIGHTS SETTLEMENTS [24 CFR 5.609(b)(25); FR Notice 2/14/23]

Regardless of how the settlement or judgment is structured, civil rights settlements or judgments, including settlements or judgments for back pay, are excluded from annual income. This may include amounts received because of litigation or other actions, such as conciliation agreements, voluntary compliance agreements, consent orders, other forms of settlement agreements, or administrative or judicial orders under the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act (Section 504), the Americans with Disabilities Act, or any other civil rights or fair housing statute or requirement.

While these civil rights settlement or judgment amounts are excluded from income, the settlement or judgment amounts will generally be counted toward the family's net family assets (e.g., if the funds are deposited into the family's savings account or a revocable trust under the control of the family or some other asset that is not excluded from the definition of *net family assets*). Income generated on the settlement or judgment amount after it has become a net family asset is not excluded from income. For example, if the family received a settlement or

back pay and deposited the money in an interest-bearing savings account, the interest from that account would be income at the time the interest is received.

Furthermore, if a civil rights settlement or judgment increases the family's net family assets such that they exceed \$50,000 (as annually adjusted by an inflationary factor), then income will be imputed on the net family assets pursuant to 24 CFR 5.609(a)(2). If the imputed income, which HUD considers unearned income, increases the family's annual adjusted income by 10 percent or more, then an interim reexamination of income will be required unless the addition to the family's net family assets occurs within the last three months of the family's income certification period and the PHA or owner chooses not to conduct the examination.

6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME [24 CFR 5.609(b)]

Other exclusions contained in 24 CFR 5.609(b) that have not been discussed earlier in this chapter include the following:

- Payments received for the care of foster children or foster adults or state or tribal kinship or guardianship care payments [24 CFR 5.609(b)(4)].
- Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation [24 CFR 5.609(b)(5)]. However, periodic payments paid at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that are received in lieu of wages for workers' compensation are included in annual income [Notice PIH 2023-27].
- Amounts received by the family that are specifically for, or in reimbursement of, the cost of health and medical care expenses for any family member [24 CFR 5.609(b)(6)].
- Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a member of the family becoming disabled [24 CFR 5.609(b)(7)].
- Income and distributions from any Coverdell education savings account under Section 530 of the Internal Revenue Code of 1986 or any qualified tuition program under Section 529 of such Code [24 CFR 5.609(b)(10)].
- Income earned by government contributions to, and distributions from, "baby bond" accounts created, authorized, or funded by federal, state, or local government [24 CFR 5.609(b)(10)].
- The special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(b)(11)].
- Payments related to aid and attendance under 38 U.S.C. 1521 to veterans in need of regular aid and attendance [24 CFR 5.609(b)(17)]. This income exclusion applies only to veterans in need of regular aid and attendance and not to other beneficiaries of the payments, such as a surviving spouse [Notice PIH 2023-27].
- Loan proceeds (the net amount disbursed by a lender to or on behalf of a borrower, under the terms of a loan agreement) received by the family or a third party (e.g., proceeds received by the family from a private loan to enable attendance at an educational institution or to finance the purchase of a car) [24 CFR 5.609(b)(20)]. The loan borrower or co-borrower must be a member of the family for this income exclusion to be applicable [Notice PIH 2023-27].

- Payments received by tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States, to the extent such payments are also excluded from gross income under the Internal Revenue Code or other federal law [24 CFR 5.609(b)(21)]. Generally, payments received by tribal members in excess of the first \$2,000 of per capita shares are included in a family's annual income for purposes of determining eligibility. However, as explained in Notice PIH 2023-27, payments made under the Cobell Settlement, and certain per capita payments under the recent Tribal Trust Settlements, must be excluded from annual income.
- Replacement housing "gap" payments made in accordance with 49 CFR Part 24 that offset increased out of pocket costs of displaced persons that move from one federally subsidized housing unit to another federally subsidized housing unit. Such replacement housing "gap" payments are not excluded from annual income if the increased cost of rent and utilities is subsequently reduced or eliminated, and the displaced person retains or continues to receive the replacement housing "gap" payments [24 CFR 5.609(b)(23)].
- Income earned on amounts placed in a family's Family Self-Sufficiency account [24 CFR 5.609(b)(27)].
- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (e.g., special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program [24 CFR 5.609(i)(12)(ii)].
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(b)(12)(i)].
- Amounts received under a resident service stipend not to exceed \$200 per month. A resident service stipend is a modest amount received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development [24 CFR 5.609 I(12)(ii)].
- Incremental earnings and benefits to any family member resulting from participation in qualifying training program funded by HUD or in qualifying federal, state, tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program unless those amounts are excluded under 24 CFR 5.609(b)(9)(i) [24 CFR 5.609(b)(12)(iv)].

HACSD Policy

The PHA defines *training program* as "a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual's ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education" [expired Notice PIH 98-2, p. 3].

The PHA defines *incremental earnings and benefits* as the difference between (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program and (2) the total amount of welfare assistance

and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].

In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member's welfare assistance and earnings reported on the family's most recently completed HUD-50058.

End of participation in a training program must be reported in accordance with the PHA's interim reporting requirements (see Chapter 11).

- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(b)(13)].
- Adoption assistance payments for a child in excess of the amount of the dependent deduction per adopted child [24 CFR 5.609(b)(15)].
- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(b)(20)].
- Amounts that HUD is required by federal statute to exclude from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(b) apply. HUD will publish a notice in the *Federal Register* to identify the benefits that qualify for this exclusion. Updates will be published when necessary.
- HUD publishes an updated list of these exclusions periodically. The most recent list of exclusions was published in the *Federal Register* on May 20, 2014. It includes:
 - (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b))
 - (b) Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966, including WIC
 - (c) Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
 - (d) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c))
 - (e) Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e)
 - (f) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f))
 - (g) Payments received under programs funded in whole or in part under the Workforce Investment Act of 1998 (29 U.S.C. 2931)
 - (h) Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective amounts
 - (i) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04)
 - (j) Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b))
 - (k) A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled *Elouise*

Cobell et al. v. Ken Salazar et al., for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010

- (l) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408)
- (m) Benefits under the Indian Veterans Housing Opportunity Act of 2010 (only applies to Native American housing programs)
- (n) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- (o) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent Orange* product liability litigation, M.D.L. No. 381 (E.D.N.Y.)
- (p) Payments received under 38 U.S.C. 1833(c) to children of Vietnam veterans born with spinal bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean service veterans born with spinal bifida
- (q) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721)
- (r) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q)
- (s) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j))
- (t) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433)
- (u) Amounts of scholarships funded under Title IV of the Higher Education Act of 1965j, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For Section 8 programs, the exception found in § 237 of Public Law 109–249 applies and requires that the amount of financial assistance in excess of tuition and mandatory fees shall be considered income in accordance with the provisions codified at 24 CFR 5.609(b)(9), except for those persons with disabilities as defined by 42 U.S.C. 1437a(b)(3)(E) (Pub. L. 109–249) (See Section 6-I.L. for exceptions.)
- (v) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- (w) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)
- (x) Any amounts in an "individual development account" as provided by the Assets for Independence Act, as amended in 2002

- (y) Payments made from the proceeds of Indian tribal trust cases as described in Notice PIH 2013–30, "Exclusion from Income of Payments under Recent Tribal Trust Settlements" (25 U.S.C. 117b(a))
- (z) Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations
- (aa) Distributions from an ABLE account, and actual or imputed interest on the ABLE account balance [See also Notice PIH 2019-09]

PART II: ASSETS

6-II.A. OVERVIEW

Annual income includes all actual anticipated income from assets (unless otherwise excluded by the regulations) even if the asset itself is excluded from net family assets [Notice PIH 2023-27].

The regulation at 24 CFR 5.603(b)(3) provides a list of items that are excluded from the calculation of net family assets. Note, unlike previous versions of the regulations, the current regulations do not list types of assets that are included in annual income. Instead, HUD relies on the definition of items excluded from assets to provide the scope of what is included. Exhibit 6-2 provides the regulatory definition of *net family assets*.

Optional policies for family self-certification of assets are found in Chapter 7. Policies related to the asset limitation may be found in Chapter 3.

Income from assets is always anticipated, irrespective of the income examination type.

HACSD Policy

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. The PHA will use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected, (2) it is not feasible to anticipate a level of income over 12 months, or (3) the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income, but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant.

Any time current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to the PHA to show why the asset income determination does not represent the family's anticipated asset income.

6-II.B. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE [24 CFR 5.603(b)(2)]

PHAs must include the value of any business or family assets disposed of by an applicant or participant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application or reexamination, as applicable, in excess of the consideration received for the asset. An asset moved to a retirement account held by a member of the family is not considered to be an asset disposed of for less than fair market value. [Notice PIH 2023-27].

Minimum Threshold

The *HCV Guidebook* permits the PHA to set a threshold below which assets disposed of for less than fair market value will not be counted [HCV GB, p. 5-27].

HACSD Policy

The HACSD will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than \$10,000.

Separation or Divorce

The regulation also specifies that assets are not considered disposed of for less than fair market value if they are disposed of as part of a separation or divorce settlement and the applicant or tenant receives important consideration not measurable in dollar terms.

HACSD Policy

All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration, mediation, or court order.

Foreclosure or Bankruptcy

Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale. Negative equity in real property or other investments does not prohibit the owner from selling the property or other investments, so negative equity alone would not justify excluding the property or other investments from family assets.

Asset Owned by a Business Entity

If a business entity (e.g., limited liability company or limited partnership) owns the asset, then the family's asset is their ownership stake in the business, not some portion of the business's assets. However, if the family holds the assets in their own name (e.g., they own one third of a restaurant) rather than in the name of a business entity, then the percentage value of the asset owned by the family is what is counted toward net family assets (e.g., one-third of the value of the restaurant) [Notice PIH 2023-27].

Family Declaration

HACSD Policy

At certification and recertification, the HACSD will obtain the family's self-certification as to whether any member has disposed of assets for \$10,000 or more under fair market value during the two years preceding the effective date of the certification or recertification.

6-II.C. ASSET INCLUSIONS AND EXCLUSIONS

Necessary and Non-Necessary Personal Property [24 CFR 5.603(b)(3)(i)]

All assets are categorized as either *real property* (e.g., land, a home) or *personal property*.

Personal property includes tangible items, like boats, as well as intangible items, like bank accounts.

The value of necessary items of personal property is excluded from the calculation of net family assets. Necessary items of personal property include a car used for commuting or medical devices.

HUD defines *necessary personal property* as items essential to the family for the maintenance, use, and occupancy of the premises as a home; or they are necessary for employment, education, or health and wellness. Necessary personal property includes more than merely items that are indispensable to the bare existence of the family. It may include personal effects (such as items that are ordinarily worn or utilized by the individual), items that are convenient or useful to a reasonable existence, and items that support and facilitate daily life within the

family's home. Necessary personal property also includes items that assist a household member with a disability, including any items related to disability-related needs, or that may be required for a reasonable accommodation for a person with a disability. Necessary personal property does not include bank accounts, other financial investments, or luxury items. Items of personal property that do not qualify as necessary personal property are classified as non-necessary personal property.

The combined value of all **non-necessary** items of personal property is only included in annual income when the combined total value exceeds \$50,000 (adjusted annually by HUD). When the combined value of all non-necessary personal property does not exceed \$50,000, as adjusted by inflation, all non-necessary personal property is excluded from net family assets.

While not an exhaustive list, the following table from Notice PIH 2023-27 provides examples of necessary and non-necessary personal property.

Necessary Personal Property	Non-Necessary Personal Property
<p>Car(s)/vehicle(s) that a family relies on for transportation for personal or business use (e.g., bike, motorcycle, skateboard, scooter)</p> <p>Furniture, carpets, linens, kitchenware</p> <p>Common appliances</p> <p>Common electronics (e.g., radio, television, DVD player, gaming system)</p> <p>Clothing</p> <p>Personal effects that are not luxury items (e.g., toys, books)</p> <p>Wedding and engagement rings</p> <p>Jewelry used in religious/cultural celebrations and ceremonies</p> <p>Religious and cultural items</p> <p>Medical equipment and supplies</p> <p>Health care–related supplies</p> <p>Musical instruments used by the family</p> <p>Personal computers, phones, tablets, and related equipment</p> <p>Professional tools of trade of the family, for example professional books</p> <p>Educational materials and equipment used by the family, including equipment to accommodate persons with disabilities</p> <p>Equipment used for exercising (e.g., treadmill, stationary bike, kayak, paddleboard, ski equipment)</p>	<p>Recreational car/vehicle not needed for day-to-day transportation for personal or business use (campers, motorhomes, traveling trailers, all-terrain vehicles (ATVs))</p> <p>Bank accounts or other financial investments (e.g., checking account, savings account, stocks/bonds)</p> <p>Recreational boat/watercraft</p> <p>Expensive jewelry without religious or cultural value, or which does not hold family significance</p> <p>Collectibles (e.g., coins/stamps)</p> <p>Equipment/machinery that is not used to generate income for a business</p> <p>Items such as gems/precious metals, antique cars, artwork, etc.</p>

HACSD Policy

In determining the value of non-necessary, non-financial personal property, the PHA will use the family's estimate of the value.

Checking and Savings Accounts [Notice PIH 2023-27]

HUD considers bank accounts as non-necessary items of personal property. Whether or not non-necessary personal property is counted toward net family assets depends on the combined value of all of the family's assets.

- When the combined value of net family assets is greater than \$50,000, as adjusted by inflation, checking and/or savings accounts would be counted toward net family assets.
- When the combined value of all non-necessary personal property does not exceed \$50,000, as adjusted by inflation, all non-necessary personal property is excluded from net family assets. In this case, the value of the family's checking and/or savings accounts would not be considered when calculating net family assets.

However, actual income from checking and savings accounts is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded.

ABLE Accounts [24 CFR 5.609(b)(10); Notice PIH 2019-09]

An Achieving a Better Life Experience (ABLE) account is a type of tax-advantaged savings account that an eligible individual can use to pay for qualified disability expenses. Section 103 of the ABLE Act mandates that an individual's ABLE account (specifically, its account balance, contributions to the account, and distributions from the account) is excluded when determining the designated beneficiary's eligibility and continued occupancy under certain federal means-tested programs. The PHA must exclude the entire value of the individual's ABLE account from the household's assets. Distributions from the ABLE account are also not considered income. However, all wage income received, regardless of which account the money is paid to, is included as income.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds [24 CFR 5.603(b)(1)]

HUD considers financial investments such as stocks and bonds non-necessary items of personal property. Whether non-necessary personal property is counted toward net family assets depends on the combined value of all of the family's assets.

- When the combined value of net family assets is greater than \$50,000, as adjusted by inflation, financial investments such as stocks and bonds are considered part of net family assets. In this case, the value of the family's financial investments such as stocks and bonds would be counted toward net family assets.
- When the combined value of all non-necessary personal property does not exceed \$50,000, as adjusted by inflation, all non-necessary personal property is excluded from net family assets. In this case, the value of the family's financial investments such as stocks and bonds would not be considered when calculating net family assets.

However, actual income from financial accounts is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded. When a stock issues dividends in some years but not others (e.g., due to market performance), the dividend is counted as the actual return when it is issued, but when no dividend is issued, the actual return is \$0. When the stock never issues dividends, the actual return is \$0.

HACSD Policy

The PHA will include interest or dividends earned by investment accounts as actual income from assets even when the earnings are reinvested.

The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash.

In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.

Lump-Sum Additions to Net Family Assets [24 CFR 5.609(b)(24(viii); Notice PIH 2023-27]

The regulations exclude income from lump-sum additions to family assets, including lottery or other contest winnings as a type of nonrecurring income.

In addition, lump sums from insurance payments, settlements for personal or property losses, and recoveries from civil actions or settlements based on claims of malpractice, negligence, or other breach of duty owed to a family member arising out of law that resulted in a member of the family becoming a family member with a disability are excluded from income.

Further, deferred periodic amounts from Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts are also excluded from income.

However, these amounts may count toward net family assets. The PHA must consider any actual or imputed returns from assets as income at the next applicable income examination. In the case where the lump sum addition to assets would lead to imputed income, which is unearned income, that increases the family's annual adjusted income by 10 percent or more, then the addition of the lump sum to the family's assets will trigger an immediate interim reexamination of income in accordance with Chapter 11. This reexamination of income must take place as soon as the lump sum is added to the family's net family assets unless the addition takes place in the last three months of family's income certification period and the PHA chooses not to conduct the examination.

For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.

HACSD Policy

Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a \$1,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.

Jointly Owned Assets [Notice PIH 2023-27]

For assets owned jointly by the family and one or more individuals outside of the assisted family, the PHA must include the total value of the asset in the calculation of net family assets, unless:

- The asset is otherwise excluded;
- The family can demonstrate that the asset is inaccessible to them; or
- The family cannot dispose of any portion of the asset without the consent of another owner who refuses to comply.

If the family demonstrates that they can only access a portion of an asset, then only that portion's value is included in the calculation of net family assets for the family.

Any income from a jointly owned asset must be included in annual income, unless:

- The income is specifically excluded;
- The family demonstrates that they do not have access to the income from that asset; or
- The family only has access to a portion of the income from that asset.

If the family demonstrates that they can only access a portion of the income from an asset, then only that portion's value is included in the calculation of income from assets.

If an individual is a beneficiary who is entitled to access the account's funds only upon the death of the account's owner, and may not otherwise withdraw funds from an account, then the account is not an asset to the assisted family, and the family should provide proper documentation demonstrating that they are only a beneficiary on the account.

Trusts [24 CFR 5.609(b)(2) and 5.603(b)(4)]

A *trust* is a legal arrangement generally regulated by state law in which one party (the creator or grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries).

The following types of trust distributions are excluded from annual income:

- Distributions of the principal or corpus of the trust; and
- Distributions of income from the trust when the distributions are used to pay the costs of health and medical care expenses for a minor.

The basis for determining how to treat trusts relies on information about who has access to either the principal in the account or the income from the account. There are two types of trusts, *revocable* and *irrevocable*.

When the creator sets up an *irrevocable trust*, the creator has no access to the funds in the account. Irrevocable trusts not under the control of any member of the family or household are not assets. Typically, special needs trusts are considered irrevocable. The value of the trust is not included in net family assets, so long as the fund continues to be held in a trust that is not revocable by, or under the control of, any member of the family or household [24 CFR 5.603(b)(4)]. Where an irrevocable trust is excluded from net family assets, the PHA must not consider actual income earned by the trust (e.g., interest earned, rental income if property is held in the trust) for so long as the income from the trust is not distributed. If the value of the trust is not considered part of the family's net assets, then distributions from the trust are treated as follows:

- All distributions from the trust's principal are excluded from income.
- Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.

A *revocable trust* is a trust that the creator of the trust may amend or end (revoke). When there is a revocable trust, the creator has access to the funds in the trust account.

The value of revocable trusts that are not under the control of the family are excluded from net family assets. This happens when a member of the assisted family is the beneficiary of a revocable trust, but the grantor is not a member of the assisted family. In this case the

beneficiary does not “own” the revocable trust, and the value of the trust is excluded from net family assets. For the revocable trust to be considered excluded from net family assets, no family or household member may be the account’s trustee. If this is the case, then distributions from the trust are treated as follows:

- All distributions from the trust’s principal are excluded from income.
- Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust’s principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.

Revocable trusts under the control of the family or household (e.g., the grantor is a member of the assisted family or household) are considered assets and must be included in net family assets.

If the value of the trust is considered part of the family’s net assets, then distributions from the trust are not considered income to the family. The PHA must count all actual returns (e.g., interest earned) from the trust as income or, if the trust has no actual returns (e.g., if the trust is comprised of farmland that is not in use) and the total value of the combined net family assets exceeds \$50,000 (as that amount is updated for inflation), as imputed returns, as applicable.

Life Insurance [FR Notice 2/14/23 and Notice PIH 2023-27]

Net family assets do not include the value of term life insurance, which has no cash value to the individual before death.

The cash value of a life insurance policy available to a family member before death, such as a whole life or universal life policy, is included in the calculation of the value of the family’s assets. The cash value is the surrender value. While the cash value of an insurance policy is considered an asset, the face value of any policy is not. If such a policy earns dividends or interest that the family could elect to receive, the amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.

Tax Refunds [24 CFR 5.603(b)(3)(xi) and Notice PIH 2023-27]

All amounts received by a family in the form of federal tax refunds or refundable tax credits are excluded from a family’s net family assets for a period of 12 months after receipt by the family.

At the time of an annual or interim reexamination of income, if the federal tax refund was received during the 12 months preceding the effective date of the reexamination, then the amount of the refund that was received by the family is subtracted from the total value of the account in which the federal tax refund or refundable tax credits were deposited. When the subtraction results in a negative number, then the balance of the asset is considered \$0.

If the tax refund or refundable tax credit is deposited into another excluded asset, such as a retirement account or a Coverdell Education Savings Account, then the deposit will have no effect on the balance of the asset (i.e., there is no need for the PHA to subtract the amount of the deposit from the value of the excluded asset).

Asset Exclusions [24 CFR 5.603(b)]

The following are excluded from the calculations of net family assets:

- The value of any account under a retirement plan recognized as such by the IRS, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals [24 CFR 5.603(b)(3)(iii)].

- The value of real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located [24 CFR 5.603(b)(3)(iv)].
 - *Real property* as used in this part has the same meaning as that provided under the law of the state in which the property is located [24 CFR 5.100].
 - Examples of this include but are not limited to co-ownership situations (including situations where one owner is a victim of domestic violence), where one party cannot unilaterally sell the real property; property that is tied up in litigation; and inherited property in dispute [Notice PIH 2023-27].
- Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a family member being a person with a disability [24 CFR 5.603(b)(3)(v)];
- The value of any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986 [24 CFR 5.603(b)(3)(vi)];
- The value of any qualified tuition program under Section 529 of such Code [24 CFR 5.603(b)(3)(vi)];
- The value of any “baby bond” account created, authorized, or funded by federal, state, or local government [24 CFR 5.603(b)(3)(vi)];
- Interests in Indian trust land [24 CFR 5.603(b)(3)(vii)];
- Equity in a manufactured home where the family receives assistance under 24 CFR part 982 [24 CFR 5.603(b)(3)(viii)];
- Equity in property under the Homeownership Option for which a family receives assistance under 24 CFR part 982 [24 CFR 5.603(b)(3)(ix)];
- Family Self-Sufficiency accounts [24 CFR 5.603(b)(3)(x)];
- Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family [24 CFR 5.603(b)(3)(xi)].
- The full amount of assets held in an irrevocable trust [Notice PIH 2023-27]; and
- The full amount of assets held in a revocable trust where a member of the family is the beneficiary, but the grantor/owner and trustee of the trust is not a member of the participant family or household [Notice PIH 2023-27].

6-II.D. DETERMINING INCOME FROM ASSETS

In some cases, amounts that are excluded from net family assets may be included as annual income when disbursements are made to a family from an asset. In other cases, amounts are excluded from annual income as a lump-sum addition to net family assets, but those funds are then considered a net family asset if held in an account or other investment that is considered part of net family assets [Notice PIH 2023-27].

Net Family Assets

Net family assets are defined as the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing real property, savings, stocks, bonds, and other forms of capital investment.

HACSD Policy

Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions such as settlement costs and transfer taxes [New PH OCC GB, *Income Determinations*, p. 24].

The calculation of asset income sometimes requires the PHA to make a distinction between an asset's market value and its cash value.

- The market value of an asset is its worth in the market (e.g., the amount a buyer would pay for real estate or the total value of an investment account).
- The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash.

The cash value of real property or other assets with negative equity would be considered \$0 for the purposes of calculating net family assets. Negative equity in real property or other investments does not prohibit the family from selling the property or other investments, so negative equity alone would not justify excluding the property or other investments from family assets [Notice PIH 2023-27].

Actual Income from Assets

Income from assets must be included on the Form HUD-50058 regardless of the amount of income. Actual income from assets is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded by 24 CFR 5.609(b).

Income or returns from assets are generally considered to be interest, dividend payments, and other actual income earned on the asset, and not the increase in market value of the asset. The increase in market value is relevant to the cash value of the asset for the purpose of determining total net family assets and imputing income.

The PHA may determine the net assets of a family based on a self-certification by the family that the net family assets do not exceed \$50,000 (adjusted annually by HUD), without taking additional steps to verify the accuracy of the declaration [24 CFR 5.618(b)]. Policies related to verification of assets are found in Chapter 7 of this policy.

The PHA may not calculate or include any imputed income from assets when net family assets total \$50,000 or less [24 CFR 5.609(b)(1)]. The actual income from assets must be included on the Form HUD-50058.

Imputed Income from Assets

When net family assets exceed \$50,000 (adjusted annually by HUD), the PHA may not rely on self-certification. If actual returns can be calculated, the PHA must include actual income from the asset on the Form HUD-50058 (for example, a savings account or CD where the rate of return is known). If actual returns cannot be calculated, the PHA must calculate imputed returns using the HUD-determined passbook rate (for example, real property or a non-necessary item of personal property such as a recreational boat). If the PHA can compute actual income from some but not all assets, the PHA must compute actual returns where possible and use the HUD-determined passbook rate for assets where actual income cannot be calculated [24 CFR 5.609(a)(2)].

An asset with an actual return of \$0 (such as a non-interest-bearing checking account), is not the same as an asset for which an actual return cannot be computed (such as non-necessary

personal property). If the asset is a financial asset and there is no income generated (for example, a bank account with a zero percent interest rate or a stock that does not issue cash dividends), then the asset generates zero actual asset income, and imputed income is not calculated. When a stock issues dividends in some years but not others (e.g., due to market performance), the dividend is counted as the actual return when it is issued, and when no dividend is issued, the actual return is \$0. When the stock never issues dividends, the actual return is consistently \$0.

PART III: ADJUSTED INCOME

6-III.A. INTRODUCTION

Overview

HUD regulations require PHAs to deduct from annual income any of five mandatory deductions for which a family qualifies and allow the PHA to deduct other permissive deductions in accordance with PHA policy. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611.

5.611 *Adjusted income* means annual income (as determined under § 5.609) of the members of the family residing or intending to reside in the dwelling unit, after making the following deductions:

(a) *Mandatory deductions*

(1) \$480 for each dependent (adjusted annually by HUD, rounded to the next lowest multiple of \$25);

(2) \$525 for any elderly family or disabled family (adjusted annually by HUD, rounded to the next lowest multiple of \$25);

(3) The sum of the following, to the extent the sum exceeds ten percent of annual income:

(i) Unreimbursed health and medical care expenses of any elderly family or disabled family;

(ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed; and

(4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.

This part covers policies related to these mandatory deductions. Verification requirements related to these deductions are found in Chapter 7.

Anticipating Expenses

HACSD Policy

Generally, the PHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., child care during school and non-school periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.

If a family has an accumulated debt for medical or disability assistance expenses, the PHA will include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The PHA may require the family to provide documentation of payments made in the preceding year.

When calculating health and medical care expenses, the PHA will include those expenses anticipated to be incurred during the 12 months following the certification date which are not covered by an outside source, such as insurance. The allowance is not intended to give a family an allowance equal to last year's expenses, but to anticipate regular ongoing and anticipated expenses during the coming year. Since these expenses are anticipated, the *PH Occupancy Guidebook* states "it is likely that actual expenses will not match what was anticipated. Typically, this would not be considered an underpayment as long as at the time of the annual reexamination, the expenses were calculated based on the appropriate verification" [New PH OCC GB, *Income Determinations*, p. 30]. For annual reexaminations, the PHA will use information for the previous 12-month period.

6-III.B. DEPENDENT DEDUCTION

An allowance of \$480 is deducted from annual income for each dependent (which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25) [24 CFR 5.611(a)(1)]. *Dependent* is defined as any family member other than the head, spouse, or cohead who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b)].

6-III.C. ELDERLY OR DISABLED FAMILY DEDUCTION

A single deduction of \$525 is taken for any elderly or disabled family (which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25) [24 CFR 5.611(a)(2)].

An *elderly family* is a family whose head, spouse, cohead, or sole member is 62 years of age or older, and a *disabled family* is a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403].

6-III.D. HEALTH AND MEDICAL CARE EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i) and 5.603(b)]

Unreimbursed health and medical care expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed ten percent of annual income.

This deduction is permitted only for families in which the head, spouse, or cohead is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are counted.

Definition of *Medical Expenses*

HUD regulations define *health and medical care expenses* at 24 CFR 5.603(b) to mean "any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed." Health and medical care expenses may be deducted from annual income only if they are eligible and not otherwise reimbursed and may only be deducted for elderly or disabled families.

Although HUD revised the definition of *health and medical care expenses* to reflect the Internal Revenue Service (IRS) general definition of medical expenses, HUD is not permitting PHAs to

specifically align their policies with IRS Publication 502 for determining which expenses are included in HUD's mandatory deduction for health and medical care expenses. PHAs must review each expense to determine whether it is eligible in accordance with HUD's definition of *health and medical care expenses*.

Families That Qualify for Both Health and Medical and Disability Assistance Expenses

HACSD Policy

This policy applies only to families in which the head, spouse, or cohead is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either a health and medical care or disability assistance expenses, the PHA will consider them health and medical care expenses.

6-III.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

Unreimbursed reasonable expenses for attendant care and auxiliary apparatus for each member of the family who is a person with disabilities may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed ten percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

Earned Income Limit on the Disability Assistance Expense Deduction

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of "earned income received by family members who are 18 years of age or older and who are able to work" because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.

HACSD Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family's request, the PHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When the PHA determines that the disability assistance expenses enable more than one family member to work, the expenses will be capped by the sum of the family members' incomes.

Eligible Auxiliary Apparatus [Notice PIH 2023-27]

Auxiliary apparatus items may include expenses for wheelchairs, ramps, adaptations to vehicles, guide dogs, assistance animals, or special equipment to enable a person who is blind or has low vision to read or type or special equipment to assist a person who is deaf or hard of hearing.

Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense.

The cost-of-service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included. See 7-IV.C. for required documentation.

Eligible Attendant Care [Notice PIH 2023-27]

Examples of attendant care expenses can include teaching a person with disabilities how to perform day-to-day tasks independently like cleaning, bathing, doing laundry, and cooking. Attendant care can be 24-hour care, or care during sporadic periods throughout the day. The family determines the type of attendant care that is appropriate for the person with disabilities.

HACSD Policy

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, the PHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Payments to Family Members

No disability assistance expenses may be deducted for payments to a member of an assisted family [24 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the assisted family may be deducted if they are not reimbursed by an outside source.

Necessary and Reasonable Expenses

The family determines the type of care or auxiliary apparatus to be provided and must describe how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

HACSD Policy

The PHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, the PHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and the PHA will consider, the family's justification for costs that exceed typical costs in the area.

6-III.F. CHILD CARE EXPENSE DEDUCTION

HUD defines *child care expenses* at 24 CFR 5.603(b) as "amounts anticipated to be paid by the family for the care of children under 13 years of age (including foster children) during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education

and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.”

Clarifying the Meaning of *Child* for This Deduction

Child care expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family’s household [VG, p. 26]. However, child care expenses for foster children that are living in the assisted family’s household are included when determining the family’s child care expenses [HCV GB, p. 5-29].

Qualifying for the Deduction

Determining Who Is Enabled to Pursue an Eligible Activity

HACSD Policy

The family must identify the family member(s) enabled to pursue an eligible activity. The term *eligible activity* in this section means any of the activities that may make the family eligible for a child care deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family’s request, the PHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

HACSD Policy

If the child care expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member’s efforts to obtain employment at each reexamination. The deduction may be reduced or denied if the family member’s job search efforts are not commensurate with the child care expense being allowed by the PHA.

The number of hours claimed for childcare may not exceed the time taken to actively seek employment as indicated on the family member’s written log.

Furthering Education

HACSD Policy

The number of hours claimed for childcare may not exceed the number of hours the family member is attending school, plus reasonable transportation time not to exceed one hour per day. To be eligible for the deduction, the family member must provide proof of enrollment in an academic or vocational school or a formal training program and the hours of classes or training.

Being Gainfully Employed

HACSD Policy

If the child care expense being claimed is to enable a family member to be gainfully employed, the family must provide evidence of the family member’s employment during the time that child care is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

Earned Income Limit on Child care Expense Deduction

When a family member looks for work or furthers their education, there is no cap on the amount that may be deducted for child care – although the care must still be necessary and reasonable. However, when child care enables a family member to work, the deduction is capped by “the amount of employment income that is included in annual income” [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any earned income disallowances or income exclusions are applied.

When the person who is enabled to work is a person with disabilities who receives the earned income disallowance (EID) or a full-time student whose earned income above \$480 is excluded, child care costs related to enabling a family member to work may not exceed the portion of the person’s earned income that actually is included in annual income. For example, if a family member who qualifies for the EID makes \$15,000 but because of the EID only \$5,000 is included in annual income, child care expenses are limited to \$5,000.

The PHA must not limit the deduction to the least expensive type of child care. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p. 5-30].

HACSD Policy

The maximum childcare expense allowed cannot exceed the amount earned by the person enabled to work whose income is actually included in the family’s annual income. The “person enabled to work” will generally be the adult member of the household who earns the least amount of income from working, unless the family provides documentation that justifies the designation of another family member as the person enabled to work. The number of hours of allowable childcare cannot exceed the number of hours worked plus reasonable transportation time not to exceed one hour per day, of the person enabled to go to work.

Eligible Child Care Expenses

The type of care to be provided is determined by the assisted family. The PHA may not refuse to give a family the child care expense deduction because there is an adult family member in the household that may be available to provide child care [VG, p. 26].

Allowable Child Care Activities

HACSD Policy

For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g., summer day camp, after-school sports league) are allowable forms of child care.

The costs of general housekeeping and personal services are not eligible. Likewise, child care expenses paid to a family member who lives in the family’s unit are not eligible; however, payments for child care to relatives who do not live in the unit are eligible.

If a child care provider also renders other services to a family or child care is used to enable a family member to conduct activities that are not eligible for consideration, the PHA will prorate the costs and allow only that portion of the expenses that is attributable to child care for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the child care provider, the calculation will be based

upon the number of hours spent in each activity and/or the number of persons under care.

Necessary and Reasonable Costs

Child care expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further their education, and (2) the family certifies, and the child care provider verifies, that the expenses are not paid or reimbursed by any other source.

HACSD Policy

Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of child care costs, the PHA will use the schedule of child care costs from a qualified local entity that either subsidizes child care costs or licenses child care providers. If the family presents a justification for costs that exceed the standard costs in the area, the HACSD will request additional documentation, as required, to support a determination that the higher cost is appropriate.

6-III.G. HARDSHIP EXEMPTIONS [24 CFR 5.611(c), (d), and (e)]

Health and Medical Care and Disability Assistance Expenses [24 CFR 5.611(c); Notice PIH 2023-27]

The regulations provide for two types of hardship exemption categories for families that qualify for unreimbursed health and medical care expenses and/or disability assistance expenses. A family will benefit from this hardship exemption only if the family has eligible expenses that can be deducted in excess of five percent of annual income. In order to claim unreimbursed health and medical care expenses, the family must have a head, cohead, or spouse that is elderly or a person with a disability. In order to claim unreimbursed reasonable attendant care and auxiliary apparatus expenses, the family must include a person with a disability, and the expenses must enable any member of the family (including the member who is a person with a disability) to be employed.

Families may be eligible for relief under one of two categories; phased-in relief or general relief, as defined below.

Phased-In Relief

The first category is applicable to all families who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income review. The family must receive phased-in relief if they are determined to be eligible. These families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first.

For these families, the threshold amount is phased-in as follows:

- The family is eligible for a deduction totaling the sum of expenses that exceeds 5 percent of annual income for the first 12 months.
- At the conclusion of 12 months, the family is eligible for a deduction totaling the sum of their expenses that exceed 7.5 percent of annual income for another 12 months.

- At the conclusion of 24 months, the standard threshold amount of 10 percent would be used, unless the family qualifies for relief under the general hardship relief category.
 - When an eligible family's phased-in relief begins at an interim reexamination, the PHA will need to process another transaction one year later to move the family along to the next phase. The transaction can be either an interim reexamination if triggered, or a non-interim reexamination transaction.

Prior to the end of the 24-month period, the family may request a hardship exemption under the second category as described below. If the family is found eligible under the second category, the hardship exemption under the first category ends, and the family's hardship is administered in accordance with the requirements listed below. Once a family requests general relief, the family may no longer receive phased-in relief.

PHAs must track the 24-month phase-period for each eligible family, even if a family's expenses go below the appropriate phase-in percentage, during the first or second 12-month phase-in period. When the family is treated as a new admission under a different property/program (e.g., the family moves from public housing to the HCV program), unless the PHA has a written policy to continue the phased-in relief upon admission, the family's expense deduction will be calculated using the 10-percent threshold unless request for general relief is approved by the PHA. When a family moves with continued assistance or ports to a new PHA, the family must continue to receive the phased-in relief. The family must receive the remaining calendar months of the percentage phase-in. The PHA must use the existing phase-in documentation to determine the remaining calendar months and the percentage phase-in.

HACSD Policy

The PHA will continue the phased-in relief for families who move from public housing to HCV.

General Relief

The second category is for families that can demonstrate:

- Their health and medical and/or disability assistance expenses increased (other than the transition to the higher threshold); or
- The family's financial hardship is a result of a change in circumstances (as defined in PHA policy) that would not otherwise trigger an interim reexamination.

The family may request a hardship exemption under the second category regardless of whether the family previously received the health and medical and/or disability assistance deductions or are currently or were previously receiving relief under the phased-in relief category above. HUD requires that PHAs develop policies defining what constitutes a hardship for purposes of this exemption.

The PHA must obtain third-party verification of the hardship or must document in the file the reason third-party verification was not available. PHAs must attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.

HACSD Policy

To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family's health and medical and/or disability assistance expenses have increased (other than the transition to the higher threshold) and that the family's financial hardship is a result of a change in circumstances. The PHA defines a change in circumstances as a decrease in income or increase in other

expenses that has resulted in the family's financial hardship. In determining whether to grant a hardship waiver for the unreimbursed health and medical expense threshold under hardship Category Two, the following criteria applies:

1. The household was not eligible for the Category One phase-in due to expense below 3% of annual income as of January 1, 2025, but has now experienced an increase in health and medical care expenses; or
2. The household, regardless of Category One eligibility, experienced an increase in health and medical care expenses or experienced an unanticipated household change which results in an increase in the family's rent portion that causes an inability to pay rent. An inability to pay rent will be defined as having a family rent share in excess of 40% of the family's monthly adjusted income that is not solely the result of a contract rent increase.
3. The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits;

The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.

The PHA must promptly notify the family in writing of the change in the determination of adjusted income and the family's rent resulting from hardship exemptions. The notice must inform the family of when the hardship exemption will begin and expire [24 CFR 5.611(e)(2)].

HACSD Policy

The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination.

If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request a hearing.

If the family qualifies for an exemption, the PHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances.

If the family qualifies, the family will receive a deduction for the sum of eligible expenses that exceed five percent of annual income.

The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever is earlier. However, the PHA may, at its discretion, extend the relief for one or more additional 90-day periods while the family's hardship condition continues. PHAs are not limited to a maximum number of 90-day extensions.

PHAs must establish written policies regarding the types of circumstances that will allow a family to qualify for a financial hardship and when such deductions may be eligible for additional

90-day extensions. PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable.

HACSD Policy

The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues to qualify for the hardship exemption based on circumstances described above. The PHA will require updated verification based on the family's current circumstances. Additional extensions may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.

Child Care Expense Hardship Exemption [24 CFR 5.611(d) and Notice PIH 2023-27]

A family whose eligibility for the child care expense deduction is ending may request a financial hardship exemption to continue receiving the deduction. If the family demonstrates to the PHA's satisfaction that the family is unable to pay their rent because of the loss of the child care expense deduction, and that the child care expense is still necessary even though the family member is not working, looking for work, or seeking to further their education, the PHA must recalculate the family's adjusted income and continue the child care deduction.

The PHA must develop a policy to define what constitutes a hardship, which includes the family's inability to pay rent. The PHA must obtain third-party verification of the hardship or must document in the file the reason third-party verification was not available. PHAs must attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.

HACSD Policy

HACSD defines a hardship under this category as a temporary circumstance requiring the family member qualifying for the deduction to leave the qualifying activity for an unanticipated reason, such as to care for a family member, which both requires the continuation of the childcare and creates a rent burden that cannot be resolved with an interim reexamination.

HACSD defines a family's inability to pay rent as an increase in the family's rent portion to that which exceeds 40% of the family's adjusted monthly income which is not solely the result of a contract rent increase.

The family must also demonstrate that the child care expense is still necessary even though the family member is no longer employed or furthering their education. The PHA will consider qualification under this criterion on a case-by case basis (for example, if the family member who was employed has left their job in order to provide uncompensated care to an elderly friend or family member who is severely ill and lives across town).

The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.

The PHA must promptly notify the family in writing of the change in the determination of adjusted income and the family's rent resulting from hardship exemptions.

If the PHA denies the request, the notice must specifically state the reason for the denial. PHAs must provide families 30 days' notice of any increase in rent.

If the PHA approves the request, the notice must inform the family of when the hardship exemption will begin and expire [24 CFR 5.611(e)(2)]. The notice must also state the requirement for the family to report to the PHA if the circumstances that made the family eligible for relief are no longer applicable and that the family's adjusted income and tenant rent will be recalculated upon expiration of the hardship exemption [Notice PIH 2023-27].

HACSD Policy

The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination.

If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request an informal grievance hearing.

If the family qualifies for an exemption, the PHA will include all required information listed above as well as information on how to request a 90-day extension based on family circumstances.

If the family qualifies, the hardship exemption and the resulting alternative adjusted income calculation must remain in place for a period of up to 90 days.

The PHA may, at its discretion, extend the hardship exemptions for additional 90-day periods based on family circumstances and as stated in PHA policies. PHAs are not limited to a maximum number of 90-day extensions. PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable.

PHAs must promptly notify families in writing if they are denied either an initial hardship exemption or an additional 90-day extension of the exemption. If the PHA denies the request, the notice must specifically state the reason for the denial.

PHAs must notify the family if the hardship exemption is no longer necessary and the hardship exemption will be terminated because the circumstances that made the family eligible for the exemption are no longer applicable. The notice must state the termination date and provide 30 days' notice of rent increase, if applicable.

HACSD Policy

The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues to qualify for the hardship exemption. The PHA will require updated verification based on the family's current circumstances. Additional extensions may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.

6-III.H. PERMISSIVE DEDUCTIONS [24 CFR 5.611(b)(1)(ii)]

The PHA may adopt additional permissive deductions from annual income if they establish a policy in the administrative plan. Permissive deductions are additional, optional deductions that may be applied to annual income. As with mandatory deductions, permissive deductions must be based on need or family circumstance and deductions must be designed to encourage self-sufficiency or other economic purpose. If the PHA offers permissive deductions, they must be granted to all families that qualify for them and should complement existing income exclusions and deductions [PH Occ GB, p. 128]. Permissive deductions may be used to incentivize or encourage self-sufficiency and economic mobility.

A PHA that adopts such deductions must have sufficient funding to cover the increased housing assistance payment cost of the deductions. A PHA will not be eligible for an increase in HCV renewal funding for subsidy costs resulting from such deductions.

HACSD Policy

The HACSD has opted not to use permissive deductions.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516; 982.551; CFR 5.230; and Notice PIH 2023-27]

Consent Forms

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 982.551]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance. While PHAs must use form HUD-9886, this form does not release all the information necessary to the administration of the program. The PHA must also develop its own release forms to cover all other necessary information.

Form HUD-9886 [24 CFR 5.230(b)(1), b(2), (c)(4), and (c)(5); and Notice PIH 2023-27]

All adult applicants and participants sign form HUD-9886, Authorization for Release of Information. All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886 at admission. Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886 be signed only once. On or after January 1, 2024 (regardless of the PHA's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886 at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886 will not be submitted to the PHA except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

The PHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. PHAs must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Adult family members are those who are expected to be 18 years of age or older at the time of annual recertification, transfer, or final eligibility determination.

All required releases must be completed "as is" by all adult family members, live-in aides and adult foster children. These forms may not be crossed out, amended, added to, or in any way altered. To do so is a program violation.

In addition, adult family members, live-in aides and adult foster children must sign additional release of information authorization forms, not covered by the above HUD required form.

Adults who are required to sign forms to release specific information will be provided copies of the forms for their review and signature.

The PHA may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the PHA determines, the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA must deny admission to applicants and terminate assistance of participants. The family may request an informal review (applicants) or informal hearing (participants) in accordance with PHA procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance or admission [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family's executed consent forms.

HACSD Policy

The HACSD has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with HACSD policy.

In order for a family to revoke their consent, the family must provide written notice to the HACSD.

Within 10 business days of the date the family provides written notice, the HACSD will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the PHA will notify their local HUD office.

7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

PHAs may, but are not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs. PHAs are not required to accept or use determinations of income from other federal means-tested forms of assistance. If the PHA adopts a policy to accept this type of verification, the PHA must establish in policy when they will accept Safe Harbor income determinations and from which programs. PHAs must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs.

Means-tested federal public assistance programs include:

- Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.);
- Medicaid (42 U.S.C. 1396 et seq.);
- Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.);
- Earned Income Tax Credit (EITC) (26 U.S.C. 32);

- Low-Income Housing Tax Credit (LIHTC) program (26 U.S.C. 42);
- Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) (42 U.S.C. 1786);
- Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.);
- Other programs administered by the HUD Secretary;
- Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and
- Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the *Federal Register*.

If the PHA elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, PHAs will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618. The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the PHA:

- Income determination effective date;
- Program administrator's signature date;
- Family's signature date;
- Report effective date; or
- Other report-specific dates that verify the income determination date.

The only information that PHAs are permitted to use to determine income under this method is the total income determination made by the federal means-tested program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by the PHA. PHAs are not permitted to mix and match Safe Harbor income determinations and other income verifications.

If the PHA is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, the PHA must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter.

If the PHA uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet the PHA's reporting requirement and occur after the effective date of the transaction.

The amounts of unreimbursed reasonable attendant care expenses and child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. PHAs are therefore required to obtain third-

party verification of the applicable employment income and cap the respective expense deductions accordingly.

HACSD Policy

When available and applicable, the HACSD will accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The HACSD will still require third-party verification of all deductions such as the health and medical care expense or child care expense deductions. Further, if the family is eligible for and claims the disability assistance expense or child care expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.

Prior to using any Safe Harbor determination from another program, the HACSD will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the HACSD will obtain third-party verification of all sources of income and assets (as applicable).

The HACSD will not accept other programs' determinations of income for any new admission or interim reexamination.

With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the HACSD will accept Safe Harbor determinations from any of the programs listed above.

In order to be acceptable, the income determination must:

- Be dated within 12 months of the dates listed above;
State the family size
- Be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members); and
- Must state the amount of the family's annual income.

The determination need not list each source of income individually. If the HACSD does not receive any acceptable income determination documentation or is unable to obtain documentation, then the HACSD will revert to third-party verification of income for the family.

When families present multiple verifications from the same or different acceptable Safe Harbor programs, the HACSD will use the most recent income determination, unless the family presents acceptable evidence that the HACSD should consider an alternative verification from a different Safe Harbor source.

When the HACSD uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the HACSD. Depending on when the change occurred, the change may or may not impact the HACSD'S calculation of the family's total annual income. Changes that occur between the time the HACSD receives the Safe Harbor documentation and the effective date of the family's annual reexamination will not be considered. If the family has a change in income that occurs after the annual reexamination effective date, the HACSD will conduct an interim reexamination if the change meets the requirements for

performing an interim reexamination as outlined in Chapter 11. In this case, the HACSD will use third-party verification to verify the change.

7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]

HUD permits PHAs to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years, the PHA may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or other inflationary adjustment factor. Streamlining policies are optional. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.

Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.

Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources.

When 90 percent or more of a family's unadjusted income is from fixed sources, the PHA may apply the inflationary adjustment factor to the family's fixed-income sources, provided that the family certifies both that 90 percent or more of their unadjusted income is fixed and that their sources of fixed income have not changed from the previous year. Sources of non-fixed income are not required to be adjusted and must not be adjusted by a COLA, but PHAs may choose to adjust sources of non-fixed income based on third-party verification. PHAs have the discretion to either adjust the non-fixed income or carry over the calculation of non-fixed income from the first year to years two and three.

When less than 90 percent of a family's unadjusted income consists of fixed income, PHAs may apply a COLA to each of the family's sources of fixed income. PHAs must determine all other income using standard verification requirements as outlined in Notice PIH 2023-27.

HACSD Policy

When the HACSD does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, the HACSD may conduct a streamlined reexamination of income for elderly families and disabled families when 100 percent of the family's income consists of fixed income.

Regardless of the percent of a family's unadjusted income from fixed income sources:

- The HACSD will streamline the annual reexamination process by applying the verified COLA/inflationary adjustment factor to fixed-income sources.
- The family will be required to sign a self-certification stating that their sources of fixed income have not changed from the previous year.
- The HACSD will document in the file how the determination that a source of income was fixed was made.
- If the family's sources of fixed income have changed from the previous year, the HACSD will obtain third-party verification of any new sources of fixed income.

- All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.
- HACSD will obtain third party verification of fixed income every three years.

In the following circumstances, regardless of the percentage of income received from fixed sources, the HACSD will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

- Of all assets when net family assets exceed \$50,000;
- Of all deductions and allowances from annual income;
- If a family member with a fixed source of income is added;
- If verification of the COLA or rate of interest is not available;
- During the intake process and at least once every three years thereafter.

7-I.D. VERIFICATION HIERARCHY [Notice PIH 2023-27]

When the PHA does not use a streamlined determination of income or an income determination from a means-tested federal assistance program, HUD requires the PHA to obtain third-party verification of:

- Reported family annual income;
- The value of net family assets when the net value exceeds \$50,000 (as adjusted annually);
- Expenses related to deductions from annual income; and
- Other factors that affect the determination of adjusted income.

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

In order of priority, the forms of verification that the PHA will use are:

HUD developed a hierarchy that described verification documentation from most acceptable to least acceptable. The PHA must demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed.

In order of priority, the hierarchy is:

- Highest: Level 6: Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Highest: Level 5: Up-front Income Verification (UIV) using a non-EIV system
- High: Level 4:
 - Written third-party verification from the source, also known as "family-provided verification"

The HACSD will re-verify the status of participants identified on the report quarterly. Based on the information provided by the family and in EIV, the HACSD may require that family members provide verifications or sign release forms in order to obtain additional verification.

When the HACSD determines through this report and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

EIV Identity Verification Report

The EIV system verifies tenant identities against SSA records. These records are compared to HUD data for a match on social security number, name, and date of birth.

PHAs are required to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2023-27].

When identity verification for a participant fails, a message will be displayed within the EIV system and no income information will be displayed.

HACSD Policy

The HACSD will identify participants whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

The HACSD will attempt to resolve discrepancies by obtaining appropriate documentation from the participant. When the HACSD determines that discrepancies exist as a result of HACSD errors such as spelling errors or incorrect birth dates, it will correct the errors promptly.

Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]

The Deceased Tenant Report identifies residents that have been reported by the SSA as deceased. The PHA is required to review the report at least quarterly.

HACSD Policy

The HACSD will review the Deceased Tenants Report on a monthly basis.

When the Deceased Tenants Report identifies an individual as being deceased, PHAs must immediately send a letter to the head of household or emergency contact person (if the head of household is deceased and there is no other adult household member) to confirm the death of the listed household member. The PHA must notify the owner in writing of the deceased head of household.

PHAs may list the EOP as the last day of the month in which the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred.

HACSD Policy

The HACSD will list the EOP as the last day of the month in which the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred.

When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for any rental assistance or continued occupancy. The PHA may not designate the live-in aide as the new head of household or change the relation code on the Form HUD-50058.

Other EIV Reports [Notice PIH 2023-27]

The PHA is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening and Failed Verification (Failed SSA Identity Test) reports at least monthly.

Upfront Income Verification Using Non-HUD Systems

In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources.

HACSD Policy

The HACSD will inform all applicants and participants of its use of the following UIV resources:

- The Work Number
- Local Public Assistance provider on-line informational link
- Computer Matching

HUD has conducted a computer matching initiative to independently verify resident income. HUD can access income information and compare it to information submitted by the HACSD on the 50058 forms. HUD can disclose social security information to PHAs but is precluded by law from disclosing federal tax return data to PHAs. If HUD receives information from federal tax return data indicating a discrepancy in the income reported by the family, HUD will notify the family of the discrepancy. The family is required to disclose the information to the PHA [24 CFR 5.240]. HUD's letter to the family will also notify the family that HUD has notified the PHA in writing that the family has been advised to contact the PHA. HUD will send the PHA a list of families who have received "income discrepancy" letters.

When the HACSD receives notification from HUD that a family has been sent an "income discrepancy" letter:

- The HACSD will wait 40 days after the date of notification before contacting the tenant.
- After 40 days, the HACSD will contact the tenant by mail, requesting the letter or other notice from HUD concerning the amount or verification of family income.
- The HACSD will place a copy of the letter to the family in the tenant file.

When the HACSD receives the required information, it will verify the accuracy of the income information provided by the family, review the HACSD interim recertification policy, identify unreported income and, if appropriate, charge retroactive rent, change the rent, or terminate assistance.

If the amount of overpaid rent owed to the HACSD exceeds \$1,000, the HACSD may seek to terminate assistance.

If the participant fails to respond to the HACSD:

1. The HACSD will ask HUD to send a second letter with a verified tenant address.
2. After an additional 40 days, the HACSD will ask HUD to send a third letter.
3. After an additional 40 days, the HACSD will send a warning letter, advising the family of the action to be taken if it does not contact the HACSD within two weeks.

If the participant claims a letter from HUD was not received:

1. The HACSD will ask HUD to send a second letter with a verified tenant address.

2. After 40 days, the HACSD will contact the family.
3. If the family claims it has not received a HUD letter, the HACSD will ask HUD to send a third letter.
4. After an additional 40 days, the HACSD will set up a meeting with the family to complete IRS forms 4506 and 8821.
5. If the family fails to meet with the HACSD or refuses to sign the IRS forms, it will be issued a warning letter indicating that termination proceedings will begin in one week if the family fails to meet with the HACSD and/or sign IRS forms.

If the participant does receive a discrepancy letter from HUD:

1. The HACSD will schedule a family meeting.
2. If the family fails to attend the meeting, the HACSD will reschedule the meeting.
3. If the family fails to attend the second meeting, the HACSD will send a termination warning.
4. The family must bring the original HUD discrepancy letter to the HACSD.
5. If tenant disagrees with the federal tax data in the HUD discrepancy letter, the family must provide documented proof of incorrect tax data.
6. If the family does not provide document proof of incorrect tax data, the HACSD will obtain proof of tax data using third-party verifications.

7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]

HUD identifies two types of Level 4 verification: written-third party verification from the source and EIV + self-certification.

EIV + Self-Certification

EIV may be used as written third-party verification and may be used to calculate income if the family agrees with the information in EIV and self-certifies that the amount is accurate and representative of current income. This practice is known as *EIV + self-certification*. When calculating income using this method, the PHA may use its discretion to determine which method of calculation is reasonable: the last four quarters combined or an average of any number of quarters. The family must be provided with the information from EIV.

HACSD Policy

At annual reexamination, if the HACSD is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, the HACSD will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

The HACSD will use an average of the last two quarters of income listed in EIV to determine income from employment. The HACSD will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, the HACSD will use written third-party verification from the source as outlined below.

If the status is questionable, the family may be required to provide verification of completion of classes (e.g. transcript) to verify that the student maintained their full-time student status. If the full-time student did not maintain their full-time status and assistance was overpaid, an overpayment agreement will be calculated and executed.

Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.

HACSD Policy

In accordance with the verification hierarchy described in section 7-1.B, the HACSD will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

- The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see section Exhibit 3-2).
- The student is at least 24 years old.
- The student is a veteran, as defined in section 3-II.E.
- The student is married.
- The student has at least one dependent child, as defined in section 3-II.E.

- The student is a person with disabilities, as defined in section 3-II.E, and was receiving assistance prior to November 30, 2005.

If the HACSD cannot verify at least one of these exemption criteria, the HACSD will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, the HACSD will then proceed to verify either the student's parents' income eligibility (see section 7-III.J) or the student's independence from their parents (see below).

Independent Student

HACSD Policy

The HACSD will verify a student's independence from their parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

- Either reviewing and verifying previous address information to determine whether the student has established a household separate from their parents for at least one year, or reviewing and verifying documentation relevant to determining whether the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)
- Reviewing the student's prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)

- Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0, except in cases in which the PHA determines that the student is a *vulnerable youth* (see section 3-II.E)

7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a participant's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' website at <http://www.hhs.gov/ocr/privacy/>.

The above cited regulation does not prohibit the following inquiries, provided these inquiries are made of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiring whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance.
- Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance.

Family Members Receiving SSA Disability Benefits

Verification of the receipt of disability benefits from the Social Security Administration (SSA) is sufficient verification of disability for the purpose of qualifying for waiting list preferences (if applicable) or certain income disallowances and deductions [VG, p. 23].

HACSD Policy

Verification of disability may be obtained from documentation of SSI or SSA disability payments under Section 223 of the Social Security Act or 102(7) of the Developmental disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(8)). For family members claiming disability who receive disability benefits from the SSA, the HACSD will attempt to obtain information about disability benefits through the HUD Enterprise Income Verification (EIV) system. If documentation from HUD's EIV System is not available, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the HACSD will ask the family to request a benefit verification letter by either calling SSA at 1-800-772-1213, or by requesting it from www.ssa.gov. Once the applicant or participant receives the benefit verification letter they will be required to provide it to the HACSD.

Family Members Not Receiving SSA Disability Benefits

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403.

HACSD Policy

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

As a reasonable accommodation to a person with disabilities, other credible evidence may also be accepted if it is determined that, due to the nature of the disability, the disabled person is unable to seek or maintain a relationship with a knowledgeable professional for sufficient time to allow the professional to develop an opinion or diagnosis.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. A detailed discussion of eligibility requirements is in the Eligibility chapter. This verifications chapter discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously-assisted occupancy. [24 CFR 5.508(g)(5)]

U.S. Citizens and Nationals

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

HACSD Policy

Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the HACSD receives information indicating that an individual's declaration may not be accurate.

Eligible Immigrants

Documents Required

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

A birth certificate is not an acceptable verification of eligible immigration status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept five years.

PHA Verification [HCV GB, pp. 5-3 and 5-7]

Non-citizens with eligible immigration status must sign a declaration of status and verification consent form, with the exception of live-in aides and foster children/adults, and all household members including live-in aides, must provide original immigration documents. Front and back copies are retained and the original immigration documents are returned to the family. The HACSD verifies the eligible immigration status through the USCIS SAVE system. If the initial search fails to verify status, the HACSD will request, within 10 days, that the USCIS conduct a second manual search. If the documents have an expiration date, the applicants/participants must provide either a current document or an USCIS screen print of their current status.

A live-in aide's legal residency will be confirmed through documents. The legal residency of foster children/adults will be verified with the placement agency.

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

Failure to Provide

If an applicant or participant family member fails to sign required declarations and consent forms and/or provide current documents or an USCIS status screen print, as required, s/he must be listed as an ineligible member. If the entire family fails to provide and sign documents as required, the family may be denied or terminated for failure to provide required information. A live-in aide will be prohibited admission to the household to serve as a live-in aide if the live-in aide fails to provide documentation of legal residency.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined placement on the waiting list.

HACSD Policy

The following preferences are applicable at the time of selection from the Waitlist.

Residency Preference: This preference applies to families who live or includes a member who works or has been notified they have been hired to work in the HACSD jurisdiction regardless of length of time.

Acceptable documentation includes two or more of the following documents that indicate the current reported resident or employment address:

- Rent receipts, leases, utility bills, employer or agency records, school records, driver's licenses, voter's registration records, credit reports, bank statements,

benefits award letter, or statement from household with whom the family is residing. If homeless, a lesser standard of documentation is acceptable.

- Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Families with Dependent Children Preference: To be eligible for this preference, the family must provide documentation that there are dependent children in the household or dependent children will be in the household once assistance is approved. A pregnant single person is no different than any other single applicant and is not considered a family with dependent children for admission preference purposes.

In most instances, self-certification is acceptable, unless there is reasonable doubt, in which case the HACSD will ask for further documentation of the placement of the children. This documentation of residence of the children may include:

- School records, Court custody documents, leases, welfare agency information, and medical records.

Veterans Preference: This preference is available to active members of the U.S. Armed Forces, veterans (a veteran with a dishonorable discharge does not qualify for this preference), or surviving spouses of veterans.

The HACSD will require U.S. government documents that indicate that the applicant qualifies under the above definition.

Working Preference: This preference is available to families with:

- The Head of household, spouse or sole household member is employed at the time of selection (must have worked an average of at least 20 hours per week for the previous 6 months). Applicants may combine job training and employment preparatory academic program participation as part of the previous 6-month requirement.
- The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits.
- The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207(b)(2)].

Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Disability Preference: This preference is available to families with a head of household or spouse who is a person with disabilities, as defined by HUD.

- The HACSD will request appropriate documentation from a knowledgeable health professional. The HACSD will not inquire as to the nature of the disability but will ask a knowledgeable health professional to confirm that the person meets the HUD definition of disability.
- Other acceptable documentation of disability is either an award letter, or proof of eligibility for social security disability or supplemental security income.

The HACSD may accept as a reasonable accommodation other credible evidence that the person meets the disability definition.

Elderly Preference: This preference is available to families with a head of household or spouse who is 62 years of age or older.

- The HACSD will require appropriate proof of age as verified by submittal of one or more of the following documents: birth certificate, passport, driver's license or resident alien card.

Homeless Preference: The documentation requirement is less stringent for homeless households, given the absence of a permanent residence. A notarized self-certification is required if the homeless household cannot provide documentation of employment/residence in the jurisdiction of the HACSD. In addition to the notarized self-certification, documentation must be provided to demonstrate residence in the jurisdiction of the HACSD around the time of selection from the waiting list.

- Acceptable documentation includes the following: driver's license, automobile registration, documentation from a San Diego County benefit provider, or receipts from stores, restaurants, motels, etc.

Special Local Preference for Homeless Applicants, Regional Taskforce on the Homeless agency members: The documentation is significantly more stringent for homeless households claiming a special local preference. In addition to the applicable documents listed above, documentation must include:

- PHA-approved referral documentation.

Special Local Preference for Non-Elderly Disabled Applicants who are homeless or exiting institutions-HHSA involved: The documentation for non-elderly disabled households claiming this special local preference is detailed in Chapter 18-I. Documentation for exiting an institution includes a certification from a medical provider. Documentation of homeless status is as listed above. In addition, documentation for each preference must include:

- PHA approved referral documentation

Special Local Preference for Victims of Domestic Violence in the HACSD's Public Housing:

- Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from the HACSD's waiting list because a family member has been determined to be the victim of domestic violence.

Special Local Preference for Families that must be Relocated from the HACSD's Public Housing Unit:

- Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from

A property is considered suitable for occupancy unless the family demonstrates that it:

- Does not meet the disability-related needs for all members of the family (e.g., physical accessibility requirements, disability related need for additional bedrooms, proximity to accessible transportation, etc.);
- Is not sufficient for the size of the family;
- Is geographically located so as to be a hardship for the family (e.g., the distance or commuting time between property and the family's place of work or school would be a hardship to the family; as determined by the PHA or owner);
- Is not safe to reside in beside of the physical condition of the property (e.g., property's physical condition poses a risk to the family's health and safety and the condition of the property cannot be easily remedied); or
- Is not a property that a family may reside in under the State or local laws of the jurisdiction where the property is located.

7-III.G. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. HUD permits PHAs to accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28]. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].

HACSD Policy

The HACSD will accept a self-certification from a family as verification of assets disposed of for less than fair market value if the value of the asset does not exceed \$10,000.

The HACSD will verify the value of assets disposed of only if:

- The HACSD does not already have a reasonable estimation of its value from previously collected information, or
- The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly participant reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately \$5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

7-III.H. NET INCOME FROM RENTAL PROPERTY

HACSD Policy

Acceptable methods of verification include:

- A current executed lease for the property that shows the rental, rent receipts, or other documentation of rent amounts

- A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).
- If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.
- Lessee's written statement verifying rent payments to the family and family's self-certification as to net income realized.
- Copies of ledgers indicating rent payments

7-III.I. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS [Notice PIH 2023-27]

PHAs are not required to verify the amount of the family's federal tax refund or refundable tax credit(s) if the family's net assets are equal to or below \$50,000 (adjusted annually for inflation), even in years when full verification of assets is required or if the PHA does not accept self-certification of assets. PHAs must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than \$50,000.

7-III.J. RETIREMENT ACCOUNTS

HACSD Policy

The HACSD will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken, and any regular payments.

7-III.K. INCOME FROM EXCLUDED SOURCES [Notice PIH 2023-27]

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to follow the verification hierarchy, For fully excluded income, the PHA is **not** required to document why third-party verification is not available, or report the income on the 50058. *Fully excluded income* is defined as income where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR 5.609(b) and any *Federal Register* notice on mandatory exclusions issued by HUD (for example, food stamps, earned income of a minor, or foster care funds).

PHAs may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that a source of income qualifies for full exclusion, PHAs have the option of requiring additional verification.

For partially excluded income, the PHA **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be

excluded and the remainder is included in annual income (for example, the income of an adult full-time student).

HACSD Policy

The HACSD will accept the family's self-certification as verification of fully excluded income.

The HACSD will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.L. ZERO INCOME STATUS REVIEWS [Notice PIH 2023-27]

A *zero income review* is an assessment, sometimes periodic, performed by the PHA of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. In calculating annual income, PHAs must not assign monetary value to nonmonetary in-kind donations from a food bank or similar organization received by the family [24 CFR § 5.609(b)(24)(vi)]. PHAs that perform zero income reviews must update local discretionary policies, procedures, and forms. Families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the Form HUD-50058.

HACSD Policy

There is no minimum income requirement. However, families who report zero or minimal income are required to complete a written certification every 30 days, and provide copies of expense receipts for the 30-day period.

The HACSD will check UIV sources and/or may request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income, child support, etc., are not being received by families claiming to have zero annual income.

The HACSD may run a credit report on the family.

The HACSD may require a family's notarized self-certification, signed under penalty of perjury, stating that it has no income, and explaining how it expects to meet its needs.

The HACSD will also require that each family member who claims zero income status complete a zero-income form. If any sources of income are identified on the form, the HACSD will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income.

The HACSD will only conduct interims in accordance with HACSD policy in Chapter 11.

7-III.M. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]

The regulations under HOTMA distinguish between two categories of student financial assistance paid to both full-time and part-time students. Any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)]. Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education not otherwise excluded by the federally mandated income exclusions are included [24 CFR 5.609(b)(9)(ii)].

HACSD Policy

The HACSD will request written third-party verification of both the source and the amount of student financial assistance. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, unless the student's only source of assistance is assistance under Title IV of the HEA, the HACSD will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution.

If the HACSD is unable to obtain third-party written verification of the requested information, the HACSD will pursue other forms of verification following the verification hierarchy in section 7-I.B.

7-III.N. parental income of students subject to eligibility restrictions

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from their parents or a *vulnerable youth* in accordance with PHA policy [24 CFR 5.612, FR Notice 4/10/06, p. 18146, and FR Notice 9/21/16].

This provision does not apply to students residing with parents who are seeking or receiving HCV assistance. It is limited to students who are seeking or receiving assistance on their own, separately from their parents.

HACSD Policy

The income of the parents of a non-independent student will be counted to determine income eligibility based on a written certification, under penalty of perjury, completed by the parents. The HACSD will determine the income eligibility of the non-independent student's parents as follows:

If the student's parents are married and living together, the HACSD will obtain a joint income declaration and certification of joint income from the parents.

If the student's parent is widowed or single, the HACSD will obtain an income declaration and certification of income from that parent.

If the student's parents are divorced or separated, the HACSD will obtain an income declaration and certification of income from each parent.

If the student has been living with one of their parents and has not had contact with or does not know where to contact their other parent, the HACSD will require the student to submit a certification describing the circumstances and stating that the student does not receive financial assistance from the other parent. The HACSD will then obtain an income declaration and certification of income from the parent with whom the student has been living.

The HACSD will use the income limits that apply where the parent with the highest income lives.

B. GLOSSARY OF SUBSIDIZED HOUSING TERMS

Absorption. In portability (under subpart H of this part 982): the point at which a receiving PHA stops billing the initial PHA for assistance on behalf of a portability family. The receiving PHA uses funds available under the receiving PHA consolidated ACC.

Accessible. The facility or portion of the facility can be approached, entered, and used by persons with disabilities.

Adjusted income. Annual income, less allowable HUD deductions and allowances.

Administrative fee. Fee paid by HUD to the PHA for administration of the program. See §982.152.

Administrative plan. The plan that describes PHA policies for administration of the tenant-based programs. The Administrative Plan and any revisions must be approved by the PHA's board and included as a supporting document to the PHA Plan. See §982.54.

Admission. The point when the family becomes a participant in the program. The date used for this purpose is the effective date of the first HAP contract for a family (first day of initial lease term) in a tenant-based program.

Affiliated individual. With respect to an individual, a spouse, parent, brother, sister, or child of that individual, or an individual to whom that individual stands in loco parentis (in the place of a parent), or any individual, tenant, or lawful occupant living in the household of that individual

Amortization payment. In a manufactured home space rental: The monthly debt service payment by the family to amortize the purchase price of the manufactured home.

Annual. Happening once a year.

Annual contributions contract (ACC). The written contract between HUD and a PHA under which HUD agrees to provide funding for a program under the 1937 Act, and the PHA agrees to comply with HUD requirements for the program.

Annual income. The anticipated total income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

Applicant (applicant family). A family that has applied for admission to a program but is not yet a participant in the program.

Area exception rent. An amount that exceeds the published FMR. See 24 CFR 982.504(b).

As-paid states. States where the welfare agency adjusts the shelter and utility component of the welfare grant in accordance with actual housing costs.

Assets. (See *net family assets*.)

Auxiliary aids. Services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in, and enjoy the benefits of, programs or activities receiving federal financial assistance.

Biennial. Happening every two years.

Bifurcate. With respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

Budget authority. An amount authorized and appropriated by the Congress for payment to PHAs under the program. For each funding increment in a PHA program, budget authority is the maximum amount that may be paid by HUD to the PHA over the ACC term of the funding increment.

Child. A member of the family other than the family head or spouse who is under 18 years of age.

Child care expenses. Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further their education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.

Citizen. A citizen or national of the United States.

Cohead. An individual in the household who is equally responsible for the lease with the head of household. A family may have a cohead or spouse but not both. A cohead never qualifies as a dependent. The cohead must have legal capacity to enter into a lease.

Common space. In shared housing, the space available for use by the assisted family and other occupants of the unit.

Computer match. The automated comparison of databases containing records about individuals.

Confirmatory review. An on-site review performed by HUD to verify the management performance of a PHA.

Consent form. Any consent form approved by HUD to be signed by assistance applicants and participants to obtain income information from employers and SWICAs; return information from the Social Security Administration (including wages, net earnings from self-employment, and retirement income); and return information for unearned income from the IRS. Consent forms expire after a certain time and may authorize the collection of other information to determine eligibility or level of benefits.

Congregate housing. Housing for elderly persons or persons with disabilities that meets the HQS for congregate housing. A special housing type: see 24 CFR 982.606–609.

Contiguous MSA. In portability (under subpart H of part 982): An MSA that shares a common boundary with the MSA in which the jurisdiction of the initial PHA is located.

Continuously assisted. An applicant is continuously assisted under the 1937 Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the voucher program.

Contract authority. The maximum annual payment by HUD to a PHA for a funding increment.

Cooperative (term includes mutual housing). Housing owned by a nonprofit corporation or association, and where a member of the corporation or association has the right to reside in a particular apartment, and to participate in management of the housing. A special housing type (see 24 CFR 982.619).

Covered families. Statutory term for families who are required to participate in a welfare agency economic self-sufficiency program and who may be subject to a welfare benefit sanction for noncompliance with this obligation. Includes families who receive welfare assistance or other public assistance under a program for which federal, state or local law requires that a member of

the family must participate in an economic self-sufficiency program as a condition for the assistance.

Dating violence. Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

The length of the relationship

The type of relationship

The frequency of interaction between the persons involved in the relationship

De minimis error. Is an error where the PHA determination of family income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (\$360 in annual adjusted income) per family.

Dependent. A member of the family (except foster children and foster adults) other than the family head or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student.

Dependent child. In the context of the student eligibility restrictions, a dependent child means a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of *dependent* as specified above.

Disability assistance expenses. Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member, and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source.

Disabled family. A family whose head, cohead, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides.

Disabled person. See *person with disabilities*.

Disallowance. Exclusion from annual income.

Displaced family. A family in which each member, or whose sole member, is a person displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws.

Domestic violence. Felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Domicile. The legal residence of the household head or spouse as determined in accordance with state and local law.

Drug-related criminal activity. The illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute, or use the drug.

Economic self-sufficiency program. Any program designed to encourage, assist, train or facilitate the economic independence of assisted families, or to provide work for such families.

Can include job training, employment counseling, work placement, basic skills training, education, English proficiency, Workfare, financial or household management, apprenticeship, or any other program necessary to ready a participant to work (such as treatment for drug abuse or mental health treatment). Includes any work activities as defined in the Social Security Act (42 U.S.C. 607(d)). Also see 24 CFR 5.603(c).

Elderly family. A family whose head, cohead, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

Elderly person. An individual who is at least 62 years of age.

Eligible family A family that is income eligible and meets the other requirements of the 1937 Act and Part 5 of 24 CFR. See also *family*.

Employer identification number (EIN). The nine-digit taxpayer identifying number that is assigned to an individual, trust, estate, partnership, association, company, or corporation.

Evidence of citizenship or eligible status. The documents which must be submitted as evidence of citizenship or eligible immigration status. See 24 CFR 5.508(b).

Extremely low-income family. A family whose annual income does not exceed the federal poverty level or 30 percent of the median income for the area, whichever number is higher. Area median income is determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30 percent of median income if HUD finds such variations are necessary due to unusually high or low family incomes. See 24 CFR 5.603.

Facility. All or any portion of buildings, structures, equipment, roads, walks, parking lots, rolling stock, or other real or personal property or interest in the property.

Fair Housing Act. Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988.

Fair market rent (FMR). The rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing, decent, safe, and sanitary rental housing of modest (non-luxury) nature with suitable amenities. See periodic publications in the *Federal Register* in accordance with 24 CFR Part 888.

Family. Includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, and can be further defined in PHA policy.

- A family with or without children (the temporary absence of a child from the home due to placement in foster care is not considered in determining family composition and family size)

- An elderly family or a near-elderly family

- A displaced family

- The remaining member of a tenant family

- A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a tenant family.

Family rent to owner. In the voucher program, the portion of rent to owner paid by the family.

Family self-sufficiency program (FSS program). The program established by a PHA in accordance with 24 CFR part 984 to promote self-sufficiency of assisted families, including the coordination of supportive services (42 U.S.C. 1437u).

Family share. The portion of rent and utilities paid by the family. For calculation of family share, see 24 CFR 982.515(a).

Family unit size. The appropriate number of bedrooms for a family, as determined by the PHA under the PHA subsidy standards.

Federal agency. A department of the executive branch of the federal government.

Foster child care payment. A payment to eligible households by state, local, or private agencies appointed by the state to administer payments for the care of foster children.

Full-time student. A person who is attending school or vocational training on a full-time basis (carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended). See 24 CFR 5.603.

Funding increment. Each commitment of budget authority by HUD to a PHA under the consolidated annual contributions contract for the PHA program.

Gender identity. Actual or perceived gender-related characteristics.

Gross rent. The sum of the rent to owner plus any utility allowance.

Group home. A dwelling unit that is licensed by a state as a group home for the exclusive residential use of two to twelve persons who are elderly or persons with disabilities (including any live-in aide). (A special housing type: see 24 CFR 982.610–614.)

Handicap. Any condition or characteristic that renders a person an individual with handicaps. (See *person with disabilities*.)

HAP contract. The housing assistance payments contract. A written contract between the PHA and an owner for the purpose of providing housing assistance payments to the owner on behalf of an eligible family.

Head of household. The adult member of the family who is the head of the household for purposes of determining income eligibility and rent.

Household. A household includes additional people other than the family who, with the PHA's permission, live in an assisted unit, such as live-in aides, foster children, and foster adults.

Housing assistance payment. The monthly assistance payment by a PHA, which includes: (1) A payment to the owner for rent to the owner under the family's lease; and (2) An additional payment to the family if the total assistance payment exceeds the rent to owner.

Housing agency (HA). See *public housing agency*.

Housing quality standards (HQS). The HUD minimum quality standards for housing assisted under the voucher program.

HUD. The U.S. Department of Housing and Urban Development.

Imputed asset. An asset disposed of for less than fair market value during the two years preceding examination or reexamination.

Imputed asset income. The PHA-established passbook rate multiplied by the total cash value of assets. The calculation is used when net family assets exceed \$5,000.

Imputed welfare income. An amount of annual income that is not actually received by a family as a result of a specified welfare benefit reduction but is included in the family's annual income and therefore reflected in the family's rental contribution.

Inability to pay rent. When the family's rent portion increases and exceeds 40% of the family's adjusted monthly income which is not solely the result of a contract rent increase.

Income. Income from all sources of each member of the household, as determined in accordance with criteria established by HUD.

Income for eligibility. Annual income.

Income information means information relating to an individual's income, including:

- All employment income information known to current or previous employers or other income sources

- All information about wages, as defined in the state's unemployment compensation law, including any social security number; name of the employee; quarterly wages of the employee; and the name, full address, telephone number, and, when known, employer identification number of an employer reporting wages under a state unemployment compensation law

- Whether an individual is receiving, has received, or has applied for unemployment compensation, and the amount and the period received

- Unearned IRS income and self-employment, wages, and retirement income

- Wage, social security, and supplemental security income data obtained from the Social Security Administration.

Individual with handicaps. See person with disabilities.

Initial PHA. In portability, the term refers to both: (1) A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and (2) A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.

Initial payment standard. The payment standard at the beginning of the HAP contract term.

Initial rent to owner. The rent to owner at the beginning of the HAP contract term.

Institution of higher education. An institution of higher education as defined in 20 U.S.C. 1001 and 1002. See Exhibit

3-2 in this Administrative Plan.

Jurisdiction. The area in which the PHA has authority under state and local law to administer the program.

Landlord. Either the owner of the property or their representative, or the managing agent or their representative, as shall be designated by the owner.

Lease. A written agreement between an owner and a tenant for the leasing of a dwelling unit to the tenant. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a HAP contract between the owner and the PHA.

Live-in aide. A person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who:

- Is determined to be essential to the care and well-being of the persons;

- Is not obligated for the support of the persons; and

Would not be living in the unit except to provide the necessary supportive services.

Living/sleeping room. A living room may be used as sleeping (bedroom) space, but no more than two persons may occupy the space. A bedroom or living/sleeping room must have at least one window and two electrical outlets in proper operating condition. See HCV GB and 24 CFR 982.401.

Local preference. A preference used by the PHA to select among applicant families.

Low-income family. A family whose income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80 percent for areas with unusually high or low incomes.

Manufactured home. A manufactured structure that is built on a permanent chassis, is designed for use as a principal place of residence and meets the HQS. (A special housing type: see 24 CFR 982.620 and 982.621.)

Manufactured home space. In manufactured home space rental: A space leased by an owner to a family. A manufactured home owned and occupied by the family is located on the space. See 24 CFR 982.622 to 982.624.

Medical expenses. Medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance (a deduction for elderly or disabled families only). These allowances are given when calculating adjusted income for medical expenses in excess of 3 percent of annual income.

Minor. A member of the family household other than the family head or spouse, who is under 18 years of age.

Mixed family. A family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status.

Monthly adjusted income. One twelfth of adjusted income.

Monthly income. One twelfth of annual income.

Mutual housing. Included in the definition of *cooperative*.

National. A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession.

Near-elderly family. A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.

Net family assets. (1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under §5.609.

In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.

Noncitizen. A person who is neither a citizen nor national of the United States.

Notice of funding availability (NOFA). For budget authority that HUD distributes by competitive process, the *Federal Register* document that invites applications for funding. This document explains how to apply for assistance and the criteria for awarding the funding.

Office of General Counsel (OGC). The General Counsel of HUD.

Overcrowded. A unit that does not meet the following HQS space standards: (1) Provide adequate space and security for the family; and (2) Have at least one bedroom or living/sleeping room for each two persons.

Owner. Any person or entity with the legal right to lease or sublease a unit to a participant.

PHA Plan. The annual plan and the 5-year plan as adopted by the PHA and approved by HUD.

PHA's quality control sample. An annual sample of files or records drawn in an unbiased manner and reviewed by a PHA supervisor (or by another qualified person other than the person who performed the original work) to determine if the work documented in the files or records conforms to program requirements. For minimum sample size see CFR 985.3.

Participant (participant family). A family that has been admitted to the PHA program and is currently assisted in the program. The family becomes a participant on the effective date of the first HAP contract executed by the PHA for the family (first day of initial lease term).

Payment standard. The maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family).

Person with disabilities. *For the purposes of program eligibility.* A person who has a disability as defined under the Social Security Act or Developmental Disabilities Care Act, or a person who has a physical or mental impairment expected to be of long and indefinite duration and whose ability to live independently is substantially impeded by that impairment but could be improved by more suitable housing conditions. This includes persons with AIDS or conditions arising from AIDS but excludes persons whose disability is based solely on drug or alcohol dependence. *For the purposes of reasonable accommodation.* A person with a physical or mental impairment that substantially limits one or more major life activities, a person regarded as having such an impairment, or a person with a record of such an impairment.

Portability. Renting a dwelling unit with a Section 8 housing choice voucher outside the jurisdiction of the initial PHA.

Premises. The building or complex in which the dwelling unit is located, including common areas and grounds.

Previously unemployed. With regard to the earned income disallowance, a person with disabilities who has earned, in the 12 months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Private space. In shared housing, the portion of a contract unit that is for the exclusive use of an assisted family.

Processing entity. The person or entity that, under any of the programs covered, is responsible for making eligibility and related determinations and any income reexamination. In the HCV program, the “processing entity” is the “responsible entity.”

Project owner. The person or entity that owns the housing project containing the assisted dwelling unit.

Public assistance. Welfare or other payments to families or individuals, based on need, which are made under programs funded, separately or jointly, by federal, state, or local governments.

Public housing agency (PHA). Any state, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities, that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

Qualified family (under the earned income disallowance). A family participating in an applicable assisted housing program or receiving HCV assistance:

Whose annual income increases as a result of employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment;

Whose annual income increases as a result of increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program; or

Whose annual income increases, as a result of new employment or increased earnings of a family member who is a person with disabilities, during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the responsible entity in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work (WTW) programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance-- provided that the total amount over a six-month period is at least \$500.

Qualified census tract. With regard to certain tax credit units, any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent, and where the census tract is designated as a qualified census tract by HUD.

Reasonable rent. A rent to owner that is not more than rent charged: (1) For comparable units in the private unassisted market; and (2) For comparable unassisted units in the premises.

Reasonable accommodation. A change, exception, or adjustment to a rule, policy, practice, or service to allow a person with disabilities to fully access the PHA’s programs or services.

Receiving PHA. In portability: A PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA issues a voucher and provides program assistance to the family.

Recertification. Sometimes called *reexamination*. The process of securing documentation of total family income used to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported.

Remaining member of the tenant family. The person left in assisted housing who may or may not normally qualify for assistance on their own circumstances (i.e., an elderly spouse dies, leaving widow age 47 who is not disabled).

Rent to owner. The total monthly rent payable to the owner under the lease for the unit (also known as contract rent). Rent to owner covers payment for any housing services, maintenance, and utilities that the owner is required to provide and pay for.

Residency preference. A PHA preference for admission of families that reside anywhere in a specified area, including families with a member who works or has been hired to work in the area (See *residency preference area*).

Residency preference area. The specified area where families must reside to qualify for a residency preference.

Responsible entity. For the public housing and the Section 8 tenant-based assistance, project-based voucher assistance, and moderate rehabilitation programs, the responsible entity means the PHA administering the program under an ACC with HUD. For all other Section 8 programs, the responsible entity means the Section 8 owner.

Secretary. The Secretary of Housing and Urban Development.

Section 8. Section 8 of the United States Housing Act of 1937.

Section 8 covered programs. All HUD programs which assist housing under Section 8 of the 1937 Act, including Section 8 assisted housing for which loans are made under Section 202 of the Housing Act of 1959.

Section 214. Section 214 of the Housing and Community Development Act of 1980, as amended.

Section 214 covered programs. The collective term for the HUD programs to which the restrictions imposed by Section 214 apply. These programs are set forth in 24 CFR 5.500.

Security deposit. A dollar amount (maximum set according to the regulations) which can be used for unpaid rent or damages to the owner upon termination of the lease.

Set-up charges. In a manufactured home space rental, charges payable by the family for assembling, skirting, and anchoring the manufactured home.

Sexual assault. Any nonconsensual sexual act proscribed by federal, tribal, or state law, including when the victim lacks capacity to consent (42 U.S.C. 13925(a)).

Sexual orientation. Homosexuality, heterosexuality or bisexuality.

Shared housing. A unit occupied by two or more families. The unit consists of both common space for shared use by the occupants of the unit and separate private space for each assisted family. (A special housing type: see 24 CFR 982.615–982.618.)

Single person. A person living alone or intending to live alone.

Single room occupancy housing (SRO). A unit that contains no sanitary facilities or food preparation facilities, or contains either, but not both, types of facilities. (A special housing type: see 24 CFR 982.602–982.605.)

Social security number (SSN). The nine-digit number that is assigned to a person by the Social Security Administration and that identifies the record of the person's earnings reported to the Social Security Administration. The term does not include a number with a letter as a suffix that is used to identify an auxiliary beneficiary.

Special admission. Admission of an applicant that is not on the PHA waiting list or without considering the applicant's waiting list position.

Special housing types. See subpart M of part 982. Subpart M states the special regulatory requirements for: SRO housing, congregate housing, group homes, shared housing, cooperatives (including mutual housing), and manufactured homes (including manufactured home space rental).

Specified welfare benefit reduction. Those reductions of welfare benefits (for a covered family) that may not result in a reduction of the family rental contribution. A reduction of welfare benefits because of fraud in connection with the welfare program, or because of welfare sanction due to noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

Spouse. The marriage or registered domestic partner of the head of household.

Stalking. To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

State wage information collection agency (SWICA). The state agency, including any Indian tribal agency, receiving quarterly wage reports from employers in the state, or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information.

Subsidy standards. Standards established by a PHA to determine the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions.

Suspension. The term on the family's voucher stops from the date the family submits a request for PHA approval of the tenancy, until the date the PHA notifies the family in writing whether the request has been approved or denied. This practice is also called *tolling*.

Tax credit rent. With regard to certain tax credit units, the rent charged for comparable units of the same bedroom size in the building that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Tenancy addendum. For the housing choice voucher program, the lease language required by HUD in the lease between the tenant and the owner.

Tenant. The person or persons (other than a live-in aide) who executes the lease as lessee of the dwelling unit.

Tenant rent to owner. See *family rent to owner*.

Term of lease. The amount of time a tenant agrees in writing to live in a dwelling unit.

Total tenant payment (TTP). The total amount the HUD rent formula requires the tenant to pay toward rent and utilities.

Unit. Residential space for the private use of a family. The size of a unit is based on the number of bedrooms contained within the unit and generally ranges from zero (0) bedrooms to six (6) bedrooms.

Utilities. Water, electricity, gas, other heating, refrigeration, cooking fuels, trash collection, and sewage services. Telephone service is not included.

Utility allowance. If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA or HUD of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

Utility reimbursement. In the voucher program, the portion of the housing assistance payment which exceeds the amount of rent to owner.

Utility hook-up charge. In a manufactured home space rental: Costs payable by a family for connecting the manufactured home to utilities such as water, gas, electrical and sewer lines.

Very low-income family. A low-income family whose annual income does not exceed 50 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50 percent of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the housing choice voucher program.

Veteran. A person who has served in the active military or naval service of the United States at any time and who shall have been discharged or released therefrom under conditions other than dishonorable.

Violence Against Women Reauthorization Act (VAWA) of 2013. Prohibits denying admission to the program to an otherwise qualified applicant or terminating assistance on the basis that the applicant or program participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

Violent criminal activity. Any illegal criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Voucher (housing choice voucher). A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

Voucher holder. A family holding a voucher with an unexpired term (search time).

Voucher program. The housing choice voucher program.

Waiting list. A list of families organized according to HUD regulations and PHA policy who are waiting for a unit to become available.

Waiting list admission. An admission from the PHA waiting list.

Welfare assistance. Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, child care or other services for working families. For the FSS program (984.103(b)), *welfare assistance* includes only cash maintenance payments from federal or state programs designed to meet a family's ongoing basic needs, but does not include food stamps, emergency rental and utilities assistance, SSI, SSDI, or social security.



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SHORT-TERM AND LONG-TERM MTW GOALS

LONG-TERM GOALS

SDHC STRATEGIC PLAN

SDHC’s Strategic Plan provides the vision, mission, purpose, core values and strategic priorities that guide SDHC’s decisions, initiatives and day-to-day efforts.

Vision: Everyone in the City of San Diego has a home they can afford.

Mission: The San Diego Housing Commission (SDHC) fosters social and economic stability for vulnerable populations in the City of San Diego through:

- Quality, affordable housing.
- Opportunities for financial self-reliance.
- Homelessness solutions.

Purpose: Help individuals, families and the San Diego community thrive.

Core Values: At SDHC, we:

- Serve our clients with equity, dignity and respect.
- Are committed to excellence and innovation in all we do.
- Believe in transparency and being good financial stewards.

Strategic Priority Areas:

1. Increasing and Preserving Housing Solutions.
2. Helping Families Increase Opportunities for Self-Sufficiency and Quality of Life
3. Investing in Our Team
4. Advancing Homelessness Solutions – Supporting the City of San Diego Community Action Plan on Homelessness
5. Advocacy, Communication, Public Engagement

The SDHC Board of Commissioners approved the Strategic Plan on July 9, 2021. SDHC’s Strategic Plan builds upon the accomplishments of the agency’s previous Strategic Plans.

COMMUNITY ACTION PLAN ON HOMELESSNESS FOR THE CITY OF SAN DIEGO

The Community Action Plan on Homelessness for the City of San Diego (Community Action Plan), which the San Diego City Council accepted in October 2019, established short-term achievable goals, key principles and foundational strategies that provide a guide for long-term success in addressing homelessness. SDHC was one of the lead agencies in the creation of the Community Action Plan, a comprehensive, 10-year plan for the City of San Diego.

The Community Action Plan recommended the creation of a governance structure that supports cross-agency collaboration, systems level thinking and accountability, including a Leadership Council to review progress and provide direction; an Implementation Team of senior staff; and a project manager position to keep progress on track.

In fall 2022, the Leadership Council requested that an updated analysis of the crisis response and housing needs in the Community Action Plan be conducted. As a result, the Implementation Team worked with Corporation for Supportive Housing (CSH) to conduct an updated needs analysis. CSH is a nationally recognized consultant that worked with the Steering Committee to develop the Community Action Plan in 2019.

Community Action Plan updates were presented to the San Diego City Council’s Land Use and Housing Committee and the City Council in fall 2023. The updated data help communities understand the amount and types of additional investments needed to address homelessness and for more efficient use of resources.

The updates identified several key trends, including:

- The number of available crisis response and housing options has almost doubled, resulting in more people accessing the services and housing they need to end their homelessness.

SECTION I – INTRODUCTION AND AGENCY GOALS



- Approximately 15,000 people a year have received assistance through City of San Diego- and SDHC-funded programs since 2019.
- More people are experiencing homelessness in the City of San Diego.
- There is an increasing need for prevention resources.

These projections outline how to provide access to housing and services for those who have entered the homeless system. Continued community conversations on housing production, zoning, affordability, availability, working with hospitals and jails, as well as access to mental health and substance use treatment services are critical to ensuring the prevention of homelessness in the community and permanent solutions that solve homelessness in the long-term.

In addition, SDHC continues to maintain a dashboard, available on SDHC’s website, that provides updates about progress made toward the Community Action Plan’s goals and objectives, as well as the Community Action Plan’s accomplishments.

SHORT-TERM GOALS

HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT OF 2016

SDHC will be implementing all necessary policy and procedural changes by January 1, 2025, to ensure compliance with the Housing Opportunity Through Modernization Act (HOTMA), pursuant to the U.S. Department of Housing and Urban Development’s (HUD) Final Rule on HOTMA, which takes effect January 1, 2024.

This process includes notification to participants and updates of SDHC’s Administrative Plan for Section 8 Rental Assistance Programs, SDHC’s Admissions and Continued Occupancy Policy and numerous documents, forms and procedural changes to align SDHC’s rental assistance programs with HOTMA updates to the federal regulations. SDHC’s policies and procedures in which approved MTW waivers and activities supersede HOTMA will remain in effect, as allowed per the Final Rule on HOTMA published in the Federal Register on February 14, 2023.

HOMEKEY PROGRAM: ADDITIONAL FUNDING FOR HOMELESSNESS HOUSING

The State of California has awarded \$20.75 million to SDHC through the state’s Homekey Program to support two projects that will provide 75 permanent affordable rental housing units with supportive services for people experiencing homelessness in the City of San Diego.

On November 20, 2023, the SDHC Board of Commissioners voted 5-0 to authorize SDHC to accept and expend these funds:

- \$16.85 million for SDHC’s proposed purchase and rehabilitation of the Ramada Inn at [3737-3747 Midway Drive](#) in the Midway Community to create 62 affordable single-room occupancy (SRO) units, to be known as Pacific Village.
- \$3.9 million for SDHC’s collaboration with Wakeland Housing and Development Corporation to rehabilitate a vacant multifamily housing property at [2147 Abbott Street](#) to create 13 affordable housing units.

The County of San Diego and City of San Diego also have committed funds to these projects. SDHC has committed rental housing vouchers to help residents pay their rent at both properties when they are completed. Residents would receive access to supportive services, such as primary health care, mental and behavioral health care, and other community-based programs to best meet a resident’s individual needs.

SDHC also has submitted two additional applications for an additional \$63.5 million from the third round of funding for the Homekey program. A decision from the state on those applications is still pending. If approved, those Homekey funds would support SDHC’s purchase of two extended-stay hotel properties to create 266 additional permanent affordable rental housing units with supportive services for people experiencing homelessness.

The Homekey program requires all awarded funds to be expended within eight months of the award. All construction or rehabilitation must be completed within 12 months of the award letter, and full occupancy must be achieved within 15 months of the award letter.

INCREASING DENSITY AT SDHC PROPERTIES

The preliminary efforts to explore increasing density at SDHC-owned properties to create additional affordable housing opportunities are moving forward through the University Avenue Densification Pilot Project.

SECTION I – INTRODUCTION AND AGENCY GOALS



This pilot project would increase density at Casa Colina, an SDHC-owned property which currently consists of 75 affordable units in City Heights for seniors with low income. This is part of a broader effort by SDHC to explore increasing density throughout its real estate portfolio to create additional affordable housing.

SDHC staff also continues to work with the County of San Diego regarding a parcel adjacent to Casa Colina. SDHC and the County of San Diego have come to terms on an exclusive negotiating agreement that outlines the process for SDHC to acquire the adjacent parcel and allow for the densification of it as well.

The California State Budget approved for Fiscal Year 2024 included \$2 million allocated directly to SDHC to support the densification pilot project. California State Senate President pro Tempore Toni Atkins advocated for this funding.

SDHC initially provided a presentation about the concept of increasing the density of its real estate portfolio on October 3, 2022, at the special joint meeting of the County of San Diego Board of Supervisors and the San Diego City Council. At that meeting, each jurisdiction adopted a joint resolution supporting an effort to increase density at SDHC properties as a way to increase the availability and production of affordable homes.

SDHC COLLABORATIVE AFFORDABLE HOUSING DEVELOPMENTS

Furthering the goal of increasing and preserving affordable housing, the following SDHC collaborative developments are among approximately 2,387 affordable rental housing units that have received at least preliminary approval from the SDHC Board of Commissioners and are pending completion:

- **8th Avenue Family Housing** (new construction) – 79 affordable units for families with low income
- **Aquila Apartments** (new construction) – 180 affordable units for individuals and families with low-income (formerly 3Roots)
- **Aurora Apartments** (new construction) – 46 affordable units for families with low income (formerly Merge 56)
- **Cerro Pueblo** (rehabilitation) – 45 affordable units for families with low income
- **Cortez Hill Apartments** (new construction) – 87 affordable units for families with low income, of which 14 units are for families experiencing homelessness
- **Courthouse Commons** (new construction, mixed-income) – 41 affordable units for families with low income
- **Cuatro at City Heights** (new construction) – 115 affordable units for families with low income, including 30 veterans experiencing homelessness
- **Casa Nueva** (rehabilitation) – 51 affordable units for families with low income
- **Harrington Heights** (new construction) – 270 affordable units for individuals and veterans experiencing homelessness and individuals with very low income (formerly 13th & Broadway)
- **Iris Avenue Trolley Apartments** (new construction) – 63 affordable units for families with low income
- **Levant Senior Cottages** (new construction) – 126 affordable units for low-income seniors
- **Mercado Apartments** (rehabilitation) – 142 affordable units for families with low income
- **Messina Senior Apartments** (new construction) – 78 affordable units for seniors with low income
- **Modica** (new construction) – 93 affordable units for individuals and families with low income
- **Navajo Family Apartments** (new construction) 44 affordable units for families with low income
- **Nestor Senior Village** (new construction) – 73 affordable rental housing units for seniors experiencing homelessness
- **SkyLINE** (new construction) – 99 affordable units for families with low income
- **Sea Breeze Gardens** (new construction) – 267 affordable units for families with low income
- **Serenade on 43rd** (partial rehabilitation and partial new construction) – 64 affordable units for families with low income, including 31 units set aside for individuals experiencing homelessness with a serious mental disability.
- **ShoreLINE** (new construction) – 124 affordable units for families with low income
- **The Iris** (new construction, mixed income) – 99 affordable units for families with low income
- **Tranquility at the Post 310** (new construction, mixed income) – 42 affordable units for veterans with low income or experiencing homelessness
- **Ulric Street Apartments II** (new construction) – 59 affordable units for seniors with low income
- **Ventana al Sur** (new construction) – 100 affordable rental housing units for seniors with low income or experiencing homelessness



SECTION II – GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION MATRIX

III. PLANNED NEW PROJECT-BASED VOUCHERS

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an AHAP will be in place by the end of the Plan Year.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
73rd Street Apartments	30	N/A	Homeless
Navajo Family Apartments	8	N/A	Low-Income
Terrasini Senior Apartments	8	N/A	Low-Income
Beyer Boulevard	30	N/A	Low-Income
Rose Creek Village	29	N/A	Low-Income

105

PLANNED TOTAL VOUCHERS TO BE NEWLY PROJECT-BASED

IV. PLANNED EXISTING PROJECT-BASED VOUCHERS

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Take Wing	8	Leased/Issued	N/A	Homeless
Hollywood Palms	23	Leased/Issued	N/A	Low-Income
Leah Residence	14	Leased/Issued	N/A	Homeless
Townspeople	9	Leased/Issued	N/A	Homeless
Potiker	36	Leased/Issued	N/A	Low-Income
Alabama Manor	14	Leased/Issued	N/A	Low-Income
Meade	10	Leased/Issued	N/A	Low-Income
Santa Margarita	12	Leased/Issued	N/A	Low-Income
Courtyard	3	Leased/Issued	N/A	Low-Income
Hotel Sandford	27	Leased/Issued	N/A	Low-Income
Connections Housing	73	Leased/Issued	N/A	Homeless
Mason Hotel	16	Leased/Issued	N/A	Homeless
Parker-Kier	22	Leased/Issued	N/A	Homeless
Celadon	88	Leased/Issued	N/A	Homeless
Alpha Square	76	Leased/Issued	N/A	Homeless
New Palace Hotel	79	Leased/Issued	N/A	Homeless
Village North Senior	44	Leased/Issued	N/A	Homeless
Atmosphere	51	Leased/Issued	N/A	Homeless
Talmdadge Gateway	59	Leased/Issued	N/A	Homeless
Cypress Apartments	62	Leased/Issued	N/A	Homeless
North Park Senior	8	Leased/Issued	N/A	Homeless
Quality Inn	91	Leased/Issued	N/A	Homeless
West Park	46	Leased/Issued	N/A	Homeless
Alpha Lofts	52	Leased/Issued	N/A	Homeless
Zephyr	84	Leased/Issued	N/A	Homeless
Vista Del Puente	38	Leased/Issued	N/A	Homeless
The Beacon	43	Leased/Issued	N/A	Homeless
Stella	62	Leased/Issued	N/A	Homeless
The Link	72	Leased/Issued	N/A	Homeless
San Ysidro Senior	50	Leased/Issued	N/A	Homeless
Benson Place	82	Leased/Issued	N/A	Homeless
Ivy Apartments	52	Leased/Issued	N/A	Homeless



SECTION II – GENERAL OPERATING INFORMATION

Trinity Place	73	Leased/Issued	N/A	Homeless
14th & Commercial	254	Leased/Issued	N/A	Homeless
The Helm (Front and Beech)	32	Leased/Issued	N/A	Homeless
The Orchard at Hilltop	25	Leased/Issued	N/A	Low-Income
Milejo Village (Jamboree)	64	Leased/Issued	N/A	Low-Income
Valley Vista	190	Leased/Issued	N/A	Homeless
Kearny Vista	142	Leased/Issued	N/A	Homeless
Hillcrest Inn	12	Leased/Issued	N/A	Homeless
ShoreLINE (Grantville)	25	Leased/Issued	N/A	Low-Income
Tizon	44	Leased/Issued	N/A	Low-Income
Nestor Senior Village	73	Leased/Issued	N/A	Low-Income
Puesa del Sol (Ulric II)	59	Leased/Issued	N/A	Low-Income
Levant Senior Cottages	70	Leased/Issued	N/A	Low-Income
Casa Nueva	19	Leased/Issued	N/A	Low-Income
Sorrento Tower	17	Leased/Issued	N/A	Low-Income
ADU Pilot	5	Leased/Issued	N/A	Low-Income
Cuatro at City Heights	48	Committed	N/A	Low-Income
Iris at San Ysidro	25	Leased/Issued	N/A	Low-Income
SkyLINE (RB Transit Village)	30	Committed	N/A	Low-Income
Harrington Heights (13th and Broadway)	105	Committed	N/A	Low-Income and homeless
Tranquility At The Post 310	10	Leased/Issued	N/A	Homeless
Ventana Al Sur	25	Leased/Issued	N/A	Homeless
Southwest Village	50	Leased/Issued	N/A	Low-income and homeless
Cortez Hill Apartments	87	Leased/Issued	N/A	Low-income and homeless
Encanto Gateway	9	Committed	N/A	Homeless
Willow Canyon	90	Leased/Issued	N/A	Homeless
Presidio Palms	161	Leased/Issued	N/A	Homeless
Pacific Village	47	Leased/Issued	N/A	Homeless
Abbot Street Apartments	13	Leased/Issued	N/A	Homeless
Serenade on 43rd	32	Committed	N/A	Homeless
Messina	8	Leased/Issued	N/A	Low-Income
Taormina Family Apartments	8	Committed	N/A	Low-Income
Price Humble Heart	33	Committed	N/A	Low-Income
3,291		PLANNED TOTAL EXISTING PROJECT-BASED VOUCHERS		

* Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued



A. HOUSING STOCK INFORMATION MATRIX

V. PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

Examples of the types of other changes can include (but are not limited to): Units held off-line due to relocation or substantial rehabilitation, local non-traditional units to be acquired/developed, etcetera.

No changes anticipated.

VI. GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

SDHC anticipates Capital Fund Program formula funds will be used to fund the soft costs, the hard costs and administrative costs of various renovation activities throughout the (8) Public Housing properties consisting of (189) public housing units. Hard costs may include upgrades to property fencing, parking lot seal and stripe, security camera and safety improvements, limited stair upgrades, exterior area and building lighting, limited electrical, and limited site improvements. Soft costs may include architecture and engineering and third-party consultants for due diligence related activities. The property and scope selection are to be determined.

SDHC also anticipates MTW funds will be used to fund capital expenditure costs of various renovation activities in Project Based Voucher and Local, Non-Traditional units. Costs may include energy efficiency measures, upgrades to plumbing and other critical needs projects.



B. LEASING INFORMATION MATRIX

I. PLANNED NUMBER OF HOUSEHOLDS SERVED

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	2,268	189
MTW Housing Choice Vouchers Utilized	183,000	15,250
Local, Non-Traditional: Tenant-Based^	14,280	1,190
Local, Non-Traditional: Property-Based^	13,469	1,122
Local, Non-Traditional: Homeownership^	0	0
PLANNED TOTAL HOUSEHOLDS SERVED	213,017	17,751

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Sponsor-Based Subsidy Program / 2011-8	10,992	916
Tenant-Based	Transitional Project-Based Subsidy Program / 2013-6	564	47
Tenant-Based	Monarch Housing Program / 2016-1	300	25
Tenant-Based	Guardian Scholars Program / 2016-2	1,080	90
Tenant-Based	Homeless Shelter Beds / 2016-3	384	32
Tenant-Based	Moving On Program / 2017-1	540	45
Tenant-Based	Moving Home Program / 2018-1	420	35
Property-Based	Affordable Housing Development / 2011-4	12,857	1,071
Property-Based	Preservation of Affordable Housing in the City of San Diego / 2021-2	612	51
Homeownership	Homeownership Program / 2022-1	0	0
PLANNED/ACTUAL TOTALS		27,749	2,312

* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

II. DISCUSSION OF ANY ANTICIPATED ISSUES / POSSIBLE SOLUTIONS RELATED TO LEASING

Discussion of any anticipated issues and solutions utilized in the MTW housing program listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	N/A
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	For the 2022-1. Homeownership Program, SDHC is continuing focus efforts on homeownership and serve families, but is planning on leveraging other opportunities to further this effort.



C. WAITING LIST INFORMATION MATRIX

I. WAITING LIST INFORMATION ANTICIPATED

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED
Housing Choice Voucher: Tenant-Based	Community Wide	58,706	Open
Housing Choice Voucher: Project-Based	Community Wide	39,500	Open
Housing Choice Voucher: Project-Based	Site-Based	12	Closed
Public Housing	Community Wide	50,380	Open
Local Non-Traditional	Community Wide	N/A	N/A

Please describe any duplication of applicants across waiting lists:

Applicants have the opportunity to apply to multiple rental assistance programs and often appear on multiple wait lists. Local Non-Traditional programs utilized the Coordinated Entry System (CES) for waitlist purposes.

II. PLANNED CHANGES TO WAITING LIST IN THE PLAN YEAR

Please describe any anticipated changes to the organizational structure or policies of the waiting lists(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Housing Choice Voucher: Tenant-Based	None
Housing Choice Voucher: Project-Based	None
Housing Choice Voucher: Project-Based (Single)	None
Public Housing	None
Local Non-Traditional	None



SECTION III – PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

2025-1. RENTAL ASSISTANCE RENT REASONABLENESS (RE-PROPOSED)

Activity Description

In order to foster housing stability for rental assistance participants, SDHC is re-proposing the MTW activity to modify the regulatory definition of Rent Reasonableness to limit Housing Choice Voucher rent increases to the lower of 5% plus the Consumer Price Index (CPI) or 10%, subject to rent reasonableness within a 12-month period. The original activity proposal is currently being reviewed by the U.S. Department of Housing and Urban Development. For project-based vouchers (PBV), rent increases will be limited to the lowest of 5% plus the Consumer Price Index (CPI), 10%, or the payment standard, subject to rent reasonableness. The modification will increase the consistency of SDHC's policy with rent control provisions in effect for unsubsidized housing in San Diego. The policies and procedures related to this activity will be detailed in SDHC's Section 8 Administrative Plan and will include ability of a landlord to appeal if this activity would create a hardship for that landlord.

By limiting the rent increases to a reasonableness percentage in this manner, SDHC, will approve rent increases according to the rent increase trends for similar unassisted units in the rental industry.

The proposed activity will further enhance participants' ability to maintain stability in their housing and may prevent terminations or evictions and facilitate a more constant and predictable tenant rent. The activity will foster an environment where landlords implement measured and incremental rent increases rather than sudden and significant rental increases. SDHC dedicates many of its project-based vouchers for permanent supportive housing, which provides assistance to the City's most vulnerable, lowest income households. This activity update will help prevent rent premiums and enhance long-term housing stability for these households.

Statutory Objectives

This activity will achieve the statutory objective to use federal dollars more efficiently through aligning Housing Choice Voucher and Project Based rent increases with the rental industry. It will support the agency's effort to maintain effective program operations and increase the ability of program participants to remain stably housed.

By limiting the amount by which rents can increase and thus reducing program costs, the activity will allow SDHC to allocate funds more strategically, potentially assisting a larger number of households, support the development of additional housing units for low-income households, or providing additional supportive services. The activity also will bolster housing choice, by increasing the ability of program participants to remain housed and freeing up funding that can be used to serve additional households.

Anticipated Timeline to Achieve Objectives

The Rental Assistance Rent Reasonableness Policy aims to bolster housing stability through measures that limit landlords' capacity to escalate rents, thereby promoting more affordable and consistent landlord submissions of increases and promoting ongoing affordability of developments. This activity will provide a continuing benefit once implemented, and thus SDHC anticipates the continuation of this activity as long as local rental market conditions result in a need for it.

The implementation of this activity is set to commence within 120 days following approval from HUD. SDHC will promptly notify landlords through a combination of mailed correspondence and electronic notifications to ensure comprehensive updates are provided. Additionally, the SDHC rent increase online and paper applications will undergo timely updates to reflect the changes. Additionally, the SDHC rent increase online and paper applications will undergo timely updates to reflect the changes.

Activity Metrics Information

METRIC	BASELINE	BENCHMARK	OUTCOME
HC #2: Units of Housing Preserved	0	14,374	

SECTION III – PROPOSED MTW ACTIVITIES – HUD APPROVAL REQUESTED



Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).			
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Projected Outcomes

- HC #2: By including percentage limitations to the definition of Rent Reasonableness, households under the Housing Choice Voucher Program will benefit from policies to preserve housing.

Description of Data Sources for Metrics

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

Cost Implications

SDHC anticipates long term cost savings related to the measures contained in the Rental Assistance Rent Reasonableness Policy. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, household composition, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding. However, SDHC can predict that limiting rent increases will help SDHC incrementally respond and predict HAP costs and make any necessary program adjustments.

Need/Justification for MTW Flexibility

The amended and restated Moving to Work agreement, Attachment C, Section (D)(2)(c) containing waivers of Sections 8(o)(l), 8(0)(2), 8(0)(3), 8(0)(10) and 8(o)(l3)(H)-(l) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518, Section (D)(2)(b) containing waivers of Section 8(0)(10) of the 1937 Act and 24 C.F.R. 982.507, and Section (D)(7)(a) containing waivers of 24 C.F.R. Part 983 as necessary to implement the Agency's Annual MTW Plan

Rent Reform/Term Limit Information (if applicable)

Impact Analysis

1. A description of how the proposed MTW activity will impact household rent/tenant share.

Advocating for reasonable increases ensures participants facing increases in their rent portion can more comfortably navigate and manage the financial implications to their household budget.

This activity would not have a negative impact on the household rent/tenant share.

2. A description of how the MTW PHA will implement and track the rent reform activity and how that process will enable the identification of any unintended consequences/impacts.

To effectively execute and monitor the policy, SDHC will continue to collect comprehensive metrics regarding interim certifications related to this initiative and will also expand metrics to include more details regarding the percent change of submitted rent increases.

3. A numerical analysis detailing the intended/possible impacts of the rent reform activity (including changes to the amount of rent/tenant share, rent burden increases/decreases, households affected, etc.)

A numerical analysis is unable to be conducted due to the nature of the activity. An unforeseen consequence could be a decrease in landlords' interest in the program due to the supplementary policies associated with setting rents.

4. A plan for how the MTW PHA will weigh the consequences/benefits of the rent reform activity to determine whether it should be adjusted/terminated/reduced/continued/expanded.

SDHC will continue to leverage the benefits of the Landlord Partnership Program that provides financial and support incentives to landlords who rent to families who receive Section 8 Housing Choice Vouchers through its programs. The below establish incentives will continue to aim to mitigate potential disinterest from landlords who might otherwise refrain from participations due to increased rental restrictions. Nevertheless, SDHC will continue to evaluate any such impact and whether any adjustment in the activity is needed as a result.

Incentive Payments

Upon Housing Assistance Payment contract execution and tenant move-in, SDHC will disburse \$500 for each rental unit rented to a Section 8 Housing Choice Voucher household.



Landlord Assurance Fund

Landlords have access to submit assurance fund claims to receive funds that will help cover expenses for repairs as a result of a tenant move out beyond normal wear and tear and rent due that exceed the security deposit. Funds are only accessible in the assurance fund within the first two years of new tenancy, and maximum reimbursement per claim is \$3,000.00. This incentive is subject to SDHC Assurance Fund Guidelines.

Move Flexibility Allowance

In cases when there is a delay in the Section 8 Housing Choice Voucher tenant vacating a subsidized unit to move into a new unit, the landlord may request up to an additional five days of Housing Assistance Payment overlap to ensure neither landlord is harmed in the process. Landlords can apply for this incentive by contacting the housing assistant assigned to the tenant that is vacating the subsidized unit.

Mobility Counseling Program

An SDHC Mobility Counselor assists with pre- and post-moving counseling, housing search assistance, and guidance about neighborhood features for families moving to Choice or Enterprise Communities within SDHC's Choice Communities Initiative. Mobility Counselors support families and landlords in the move process to ensure timely lease-ups.

SDHC Landlord Service Unit

SDHC has established a Landlord Service Unit, which consists of seven SDHC employees who provide quality customer service to landlords and tenants in the HCV program. This includes a Landlord Liaison, who provides HCV Program education, guidance, and support to landlords who rent to HCV program participants, as well as a dedicated team of Mobility Counselors, who support families in the moving process to ensure timely lease-ups.

Security Deposit Loan Assistance

Families moving to Choice or Enterprise Communities through SDHC's Choice Communities Initiative are eligible for no-interest security deposit loans up to the payment standards for the area for their voucher size.

Hardship Case Criteria

Not applicable. This activity only will reduce rents for program participants in some instances and will have no negative impacts that could cause hardship for them.

Description of Annual Reevaluation

To effectively execute and monitor the policy, SDHC will continue to collect comprehensive metrics regarding interim certifications related to this initiative and will also expand metrics to include more details regarding the percent change of submitted rent increases.

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

Transition Period

The implementation of this activity is set to commence within 120 days following approval from HUD. SDHC will promptly notify landlords through a combination of mailed correspondence and electronic notifications to ensure comprehensive updates are provided. Additionally, the SDHC rent increase online and paper applications will undergo timely updates to reflect the changes.

2025-2. EXPEDITED ELIGIBILITY AND LEASING EXCEPTIONS

Activity Description

The need for additional affordable housing in San Diego remains significant. The City of San Diego continues to experience a shelter crisis, as declared by the San Diego City Council in a resolution adopted February 7, 2022, that remains in effect. Therefore, additional incentives and strategies are necessary to expedite the placement of low-income households (including seniors, people with disabilities and families) and households experiencing homelessness into rental homes with voucher assistance.



The annual Point-in-Time Count, conducted by the San Diego Regional Task Force on Homelessness (RTFH) on January 26, 2023, identified 6,500 individuals experiencing homelessness in the City of San Diego, a 35% increase from 2022. The city of San Diego's rental vacancy rate of 2.64% also poses a challenge for people experiencing homelessness finding suitable rental housing as rental units are scarce and limited.

SDHC experienced success with the waivers implemented for the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Emergency Housing Voucher (EHV) program to expedite housing placements and maintain housing stability.

SDHC aims to build upon previous waivers and expand on the Housing Opportunities through Modernization Act (HOTMA) self-certifications to continue streamlining processes for new admissions to allow eligibility determinations and approval of housing to be completed in the shortest times possible and to strengthen the City of San Diego's efforts to address the housing crisis. This is essential to place vulnerable households into the limited supply of housing as it becomes available in San Diego.

Approval of these measures will streamline the process for new admissions of vulnerable populations, including people experiencing homelessness to allow eligibility determinations and approval of housing to be completed in the shortest times possible. This is essential to place vulnerable households into the limited supply of housing as it becomes available in San Diego.

Proposed exceptions will include the following:

1. Verification of legal Identity (ID, DOB) and Social Security Number 24 CFR 5.216(g)(1), 24 CFR 5.403; 5.603
 - Waive the requirement for original documents. SDHC will allow photocopies of acceptable documentation and alternative verification including self-certification for unhoused household members who are unable to provide evidence of their legal identity (ID, DOB) and/or SSN.
 - SDHC will run the EIV report within 120 days of the New Admission processed date. If SSN verified, no further verification is required. If not verified in EIV, must provide documentation as required under 24 CFR 5.216(g)(1)
2. Citizenship Verification: 24 CFR 5.508(b)(2); 5.508(b)(3)
 - If a member of the family is unable to provide evidence of their eligible non-citizen status SDHC may accept a signed self-certification of applicant's eligible non-citizen status. Required documentation must be provided and verified within 90 days of the new admission to be eligible for continued assistance. Exceptions to the 90-day timeline may be made on a case-by-case basis if applicant/participant can provide verification that additional time is needed to provide required documentation.
3. Income Verification 24 CFR 5.240(c)
 - SDHC may accept self-certification of income and/or expenses without notarization as the highest form of verification for unhoused applicant family that is unable to provide or if the existing income verification hierarchy is unavailable.
4. Additional Flexibilities for Permanent Supportive Housing (PSH) Programs to Expedite Eligibility and Leasing
 - Criminal Background Check: The criminal history report performed by property management can be used.
 - Tenant Briefing: SDHC will allow applicant to complete a briefing within 30 days of the move-in.

Statutory Objectives

The activity will achieve the statutory objective to use federal dollars more efficiently by further streamlining processes in the Rental Assistance Division and may improve housing choices for low-income families and persons experiencing homelessness by creating solutions to address barriers in leasing up .

Anticipated Timeline to Achieve Objectives

SDHC anticipates implementing the streamlining measures by the beginning in Fiscal Year 2025.

SECTION III – PROPOSED MTW ACTIVITIES – HUD APPROVAL REQUESTED



Activity Metrics Information

METRIC	BASELINE	BENCHMARK	OUTCOME
CE #2: Staff Time Savings <i>Total time to complete the task in staff hours (decrease)</i>	1,414	1,060.5	
HC #4: Displacement Prevention <i>Number of households at or below 80% AMI that would lose assistance or need to move (decrease). If units reach a specific type of household, give that type in this box.</i>	0	7	

Projected Outcomes

- CE #2: SDHC anticipates reducing staff time to process new admissions by 25%
- HC #4: SDHC is anticipating a decrease in the number of households who would lose assistance

Description of Data Sources for Metrics

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

Cost Implications

SDHC anticipates long term cost savings related to the measures contained in this activity. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, household composition, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding.

Need/Justification for MTW Flexibility

The amended and restated Moving to Work agreement, Attachment C, Section (D)(3)(b) containing waivers of certain provisions of 24 C.F.R. 982.516 and 982 Subpart E,

Rent Reform/Term Limit Information (if applicable)

Impact Analysis

An impact analysis was conducted that reviewed new admissions completed during the COVID pandemic, when similar regulatory waivers and alternative requirements for Housing Choice Voucher were allowable under the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Public Law 116-136). The analysis compared the new admissions in SDHC's special programs that were completed during the CARES Act timeframe against the number of households who ended participation from the program due to failure to provide information or unreported income. Only 1% of the households were terminated due to these reasons.

Further streamlining processes are expected to create stability and improve social and emotional well-being by expediting housing placements and providing families with subsidies in the shortest times possible. SDHC experienced success with the waivers implemented in the CARES Act to expedite housing placements and maintain housing stability. Of the new admissions completed during the time, similar waivers were implemented under the CARES Act, only 1% of households experiencing homelessness were terminated due to failure to provide information or due to unreported income.

Hardship Case Criteria

This proposed policy will have a positive effect on participants by expediting housing placements and providing families with subsidies in the shortest times possible.

2025-3. FAMILY UNIFICATION PROGRAM (FUP)/FOSTER YOUTH TO INDEPENDENCE (FYI)

Activity Description

This activity is to modify Family Unification Program (FUP) Youth / Foster Youth to Independence (FYI) Subsidy extension approval months.



The Fostering Stable Housing Opportunities (FSHO) amendments made changes to the FUP authorized under section 8(x) of the U.S. Housing Act of 1937 to provide eligible youth with an extension of FUP/FYI voucher assistance for up to 24 months beyond the 36-month time limit of assistance if they are participating in an FSS program under section 23 of the U.S. Housing Act of 1937 (42 U.S.C. 1437u) expanding access to housing youth exiting foster care for up to 60 months. The changes also included FYI vouchers.

The FSHO applies to youth where the effective date of the Housing Assistance Payment Contract (HAP) execution is after December 27, 2020. The FSHO provides an extension of voucher assistance for up to 24 months for FUP/FYI youth who are participating in a FSS program, for FUP/FYI youth who are unable to enroll in FSS but are engaged in education, workforce development, or employment activities for at least 9 months of the 12-month period preceding the extension and for FUP/FYI youth who meet one of the statutory exemptions.

FSHO compliance is set on an annual basis at the end of the 36-month and 48-month time periods in conjunction with reviews for determining income eligibility for the HCV program. There are recommendations for PHAs to ensure that sufficient time is provided for the FUP/FYI youth to demonstrate that they meet one of these statutory requirements; and MTW agencies may establish alternative terms, conditions or requirements for the extension of FUP/FYI assistance and include the terms in the Annual MTW Plan.

SDHC proposes to modify the Family Unification (FUP) Youth/Foster Youth to Independence (FYI) time period for verification of eligibility for subsidy extension. SDHC will review participant eligibility for subsidy extension by the end of the 24-month and 48-month time periods instead of at 36-months and 48-months.

This modification will increase the number of youth eligible for program extensions, provide participating youth additional time to implement the criteria to meet extension requirements for rental assistance, increase self-sufficiency, and align with SDHC's biennial recertification cycle.

If a youth does not meet the extension requirement at the end of the 24-month period, SDHC will continue to communicate with the youth between the 24-month and 36-month time period, enabling the youth sufficient time to meet one of the statutory conditions that allow for the extension of FUP/FYI assistance. SDHC will not conduct a review for determining income eligibility for the HCV program at 36 months.

Statutory Objectives

This activity will increase self-sufficiency because it will allow the youth additional time under the program to participate in a FSS program or engage in education or workforce activities. It will also achieve the statutory objective to use federal dollars more efficiently because the review timing will align with SDHC's biennial recertification cycle and will reduce administrative burden of having to complete program voucher extension, for eligible participants, outside of the regular biennial recertification cycle.

Anticipated Impacts and Timeline to Achieve Objectives

SDHC anticipates implementing the streamlining measures by the beginning of Fiscal Year 2025.

Activity Metrics Information

METRIC	BASELINE	BENCHMARK	OUTCOME
CE #2: Staff Time Savings <i>Total time to complete the task in staff hours (decrease)</i>	40	20	
SS #5: Households assisted by Services that Increase Self-Sufficiency <i>Number of households receiving services aimed to increase self sufficiency (increase).</i>	0	16	

Projected Outcomes



- CE #2: SDHC is anticipating a decrease in overall staff hours.
- SS #5: SDHC is anticipating an increase in the number of youth who will be assisted by services that increase self-sufficiency.

Description of Data Sources for Metrics

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

Cost Implications

SDHC anticipates long term cost savings related to the measures contained in this activity. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, household composition, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding.

Need/Justification for MTW Flexibility

Rent Reform/Term Limit Information (if applicable)

Impact Analysis

An impact analysis was performed that reviewed current active participants and found that 40% of participants would benefit from this activity because they are currently not enrolled in the Family Self Sufficiency Program. Providing the option to extend their program expiration date at the 24 month mark, instead of the 36 month mark, may incentivize participants to enroll in the FSS program earlier, which in turn increases their chances of becoming self-sufficient by the end of the FUP program expiration period. Additionally, the earlier participants enroll in the FSS program, the more time they have to work on goals to attain self-sufficiency.

Hardship Case Criteria

No negative impact is anticipated so a hardship is not necessary for this activity. SDHC will continue to work with participants to encourage them to enroll in FSS or meet another extension eligible activity between the 24 month and 36 month period before their initial program expiration date. Checking for initial program extension at 24 months allows SDHC staff to identify participants not enrolled earlier and work with them to enroll in FSS and or to encourage them to seek or continue employment, workforce development, or education opportunities 9 of the 12 months prior to the 36 month program participation period



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IMPLEMENTED ACTIVITIES

2022-1.

HOMEOWNERSHIP PROGRAM

PLAN YEAR APPROVED: 2022

RE-PROPOSED: N/A

DESCRIPTION

Using Broader Use of Funds Authority, SDHC allocated up to \$5 million towards the existing first-time homebuyer's programs, which should assist up to 50 families under 80% AMI in being able to purchase a home in the City of San Diego. Currently, SDHC receives funding for its homeownership programs via HOME, Community Development Block Grants (CDBG), California CalHome Program funds, and the City of San Diego Affordable Housing Fund.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2021-2.

PRESERVATION OF AFFORDABLE HOUSING IN THE CITY OF SAN DIEGO

PLAN YEAR APPROVED: 2021

RE-PROPOSED: N/A

DESCRIPTION

SDHC created a Local Non-Traditional, Property-Based activity to provide financing for the preservation and rehabilitation of properties that are not owned by SDHC. In seeking funding for preservation or rehabilitation, landlords will be incentivized to maintain the affordability of the units and improve housing stock as they provide safe, decent and sanitary dwelling units.

SDHC is committed to preserving affordable housing within the City of San Diego, by developing methods of financing to incentivize property owners to preserve their existing affordable housing units. Financing received through SDHC will help these property owners complete necessary health and safety upgrades to dwelling units that could normally be cost-prohibitive, leading to an increase in rent for tenants. In receiving this funding, this ensures that properties receiving SDHC funds remain affordable to low-income families for the foreseeable future.

During FY 2021 and FY 2022, NOFAs were developed aimed at the preservation of deed-restricted and naturally occurring affordable housing (NOAH).

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2021-1.

ESTABLISHMENT OF ALTERNATIVE REASONABLE COST LIMITS

PLAN YEAR APPROVED: 2021

RE-PROPOSED: N/A

DESCRIPTION

SDHC received permission to develop alternative reasonable cost limits to include Total Development Costs (TDC) and Hard Construction Costs (HCC) for the amount of Moving to Work funds that can be contributed in SDHC's local non-traditional development and rehabilitation activities. Over the past several years, the San Diego metropolitan area has seen massive increases in the cost to develop and rehabilitate new and existing properties.

SDHC has seen multiple projects exceed HUD-published limits for the San Diego region, as the Rental Housing Finance Division is a lender, conduit bond issuer, and administrator of the City of San Diego's affordable land use programs including the Inclusionary, Density Bonus, Single-Room Occupancy, and Coastal Replacement Housing ordinances. Using the alternative reasonable cost formula, SDHC was able to increase its ability to ensure that more affordable units are developed or rehabilitated within the City of San Diego.

Prior Updates

- FY 2023: The alternative reasonable cost limits were updated using the approved activity methodology

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2020-1. LANDLORD RETENTION AND INCENTIVE PROGRAM

PLAN YEAR APPROVED: 2020

RE-PROPOSED: N/A

DESCRIPTION

The Landlord Partnership Program (LPP) aims to expand rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive by providing both financial and supporting incentives to landlords who rent to HCV Program participants within the City of San Diego.

Incentives are designed to recruit new landlords and units as well as retain existing units within the portfolio of available housing.

Prior Updates

- FY 2023: Landlord Partnership Assurance Fund: For damages caused by tenant beyond normal wear and tear or failure to pay rent, landlords may request assurance funds to cover expenses that exceed security deposits. Landlords can access assurance funds only within first two years of new tenancy. SDHC will establish a maximum permissible award per tenancy. The maximum will be determined by SDHC using the local market averages and may be adjusted for inflation, the proposed budget for this fund is \$250K.
- FY 2022: SDHC included other eligible expenses related to the leasing of units and recruitment/retention of HCV owners to facilitate the successful leasing and use of housing vouchers by families. This may include, but not be limited to, application fees, processing fees, holding deposits, landlord recruitment and incentive payments, such as unit hold payments, to assist families with various up-front costs for leasing units in an expedited manner.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2018-1. MOVING HOME: A RAPID REHOUSING PROGRAM

PLAN YEAR APPROVED: 2018

RE-PROPOSED: 2024

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC created rapid re-housing program to provide housing subsidies to individuals and households experiencing homelessness while supportive services are provided to strengthen stabilization. The activity was also expanded to include a rapid stabilization component for individuals and households who are experiencing significant housing instability and are considered highly or especially vulnerable should they lose their housing.

Prior Updates

- FY 2024: The activity was re-proposed to include a rapid stabilization component for individuals and households who are experiencing significant housing instability.
- FY 2020: The program budget was increased to \$5 million in a technical amendment approved in April 2020 due to COVID-19.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: Moving Home has been re-proposed in the FY 2024 MTW Annual Plan to include a rapid stabilization component.

2017-1. THE MOVING ON PROGRAM

PLAN YEAR APPROVED: 2017

RE-PROPOSED: N/A

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC created a pilot program to provide housing subsidy to formerly homeless individuals and families no longer requiring a permanent supportive housing solution to sustain housing stability.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2016-3. HOMELESS SHELTER BEDS

PLAN YEAR APPROVED: 2016

RE-PROPOSED: N/A

DESCRIPTION

In FY 2016, SDHC received approval under Broader Uses of Funds Authority to subsidize shelter beds in the City of San Diego. Shelter programs serve a variety of needs and subpopulations. SDHC and regional partners have identified, similar to housing interventions, that a continua of options is needed to engage certain sub-populations, especially those that are historically hesitant to enter traditional congregate shelter. This approach aligns with the goals and practices set forth in the Community Action Plan on Homelessness for the City of San Diego. All contracted programs are required to follow Housing First principles with low barriers to entry and align with regional Continuum of Care community standards and national best practices as detailed in contracted scopes of work. In alignment with national best practice to provide low-barrier shelter access, only criminal history related to life-time sex offender status and convictions resulting from manufacturing methamphetamine in federally assisted housing will be considered.

Prior Updates

- FY 2022: SDHC will provide MTW funding to shelter providers through a competitive process, to develop and/or acquire new family congregate sites. In addition, the program budget will be increased to \$12.8 million, based on an average cost of \$52.06 per night.
- FY 2020: The program MTW budget was increased to \$8 million.

PLANNED NON-SIGNIFICANT CHANGES: SDHC may provide MTW funding for homelessness sector programs/services to provide shelter services and to develop and/or acquire new traditional congregate or alternative safe sheltering sites.

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2016-2. THE GUARDIAN SCHOLARS PROGRAM

PLAN YEAR: 2016

RE-PROPOSED: N/A

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC provides funding to San Diego State University to assist students with the housing component of their education. The target population is former foster care youth, wards of the court, or unaccompanied homeless youth. SDHC provides \$200,000 annually and matches up to an additional \$400,000 of philanthropic funds for an aggregate total of \$600,000 annually.

Prior Updates

- FY 2023: The SDHC will determine how frequently it will revisit based on market trends and funding availability the compensation to award the program
- FY 2021: A modified alternate HQS policy will be used for the units funded through the program.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2016-1. THE MONARCH SCHOOL PROJECT

PLAN YEAR: 2016
RE-PROPOSED: 2020

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC created a pilot program to provide housing subsidy to homeless families with minors enrolled in Monarch School. The Achievement Academy delivers work readiness services (such as job placement and training) to the adult family members.

Prior Updates

- FY 2024: In order to prevent housing instability and encourage self-sufficiency for families participating in the Monarch Program, in FY 2024 SDHC updated its administrative plan to detail that SDHC may provide continued assistance to families even if they no longer have a student enrolled in the Monarch School. If a family moved to a different school district or the youngest child has completed 12th grade and/or is no longer attending school continuously, SDHC will determine the appropriateness of future rental assistance and supportive services that best meets the family's needs as outlined in the SDHC Admin Plan.
- FY 2020: Activity was re-proposed, broadens the initiative to allow for permanent supporting housing as required.
- FY 2018: Activity now utilizes the Coordinated Entry System (CES) for programmatic referrals.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2015-1. MODIFY THE 40 PERCENT RENT BURDEN REQUIREMENT

PLAN YEAR: 2015
RE-PROPOSED: N/A

DESCRIPTION

Modifies the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2014-2. LOCAL INCOME INCLUSION

PLAN YEAR: 2014
RE-PROPOSED: N/A

DESCRIPTION

Income from Kin-GAP, foster care payments, and adoption assistance payments is included in the determination of the household's annual adjusted income. The activity utilizes waivers allowing for an alternate rent calculation methodology.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2013-6.
**TRANSITIONAL
PROJECT-BASED
SUBSIDIES FOR THE
HOMELESS**
**PLAN YEAR: 2013
RE-PROPOSED: N/A**
DESCRIPTION

Utilizing Broader Uses of Funds Authority, SDHC partners with agencies to craft a transitional housing program using project-based subsidies paired with supportive services, offered by the selected provider agency. SDHC is currently partnering with PATH, Episcopal Community Services, and Senior Community Center in this endeavor.

Prior Updates

- FY 2022: SDHC revised the maximum subsidy to be aligned with the HCV housing assistance payments per unit cost (PUC) per bed, and this may be adjusted periodically to account for rising costs of administering the program including, but not limited to, rising rental costs.
- FY 2020: A modified alternate HQS policy will be used for the beds funded through the program.
- FY 2017: The target populations are expanded to include homeless veterans and victims of human trafficking.
- FY 2016: Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. The maximum subsidy is \$700 per bed. The target populations are expanded to include homeless veterans and victims of human trafficking.
- FY 2015: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program.

PLANNED NON-SIGNIFICANT CHANGES: Project-based subsidy for these programs will be awarded on a competitive basis. The exception will be if the program is housed in an SDHC-owned and/or SDHC-controlled development (for example long-term, master lease), in which case the subsidy will be awarded non-competitively, per a prior HUD-approved MTW activity.

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

**2013-4. PUBLIC
HOUSING: FLAT
RENT ELIMINATION**
**PLAN YEAR: 2013
RE-PROPOSED: N/A**
DESCRIPTION

Eliminate flat rents in public housing in order to facilitate the implementation of Path to Success for public housing residents. The activity utilizes waivers allowing SDHC to determine alternative rent policies within the public housing program.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

**2013-2. FAMILY
SELF-SUFFICIENCY
REINVENTION**
**PLAN YEAR: 2013
RE-PROPOSED: 2015**
DESCRIPTION

Modifies the Family Self-Sufficiency (FSS) program by revising the contract term and the escrow calculation method to coincide with the Path to Success initiative. Changes to the program include a \$10,000 maximum on total escrow accumulation, escrow deposits based on outcomes achieved, and a two-year contract term with the option to extend the contract an additional three years if additional time is needed to attain goals.

Prior Updates

- FY 2022: HUD published the FSS Program Final Rule effective June 16, 2022. SDHC adopted the final rule, but will keep the flexibilities approved under the existing MTW FSS Program Activity.
- FY 2015: Activity was re-proposed to allow an adult household member to enroll in the program as the sole participant
- FY 2014: The FSS Action Plan detailing the flat escrow deposit feature of the program is pending submission to HUD for approval. The flat escrow deposit schedule containing the outcomes and the corresponding deposit amounts will be further described in the Fiscal Year 2013 MTW Annual Report.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2013-1. MTW VASH PROGRAM

PLAN YEAR: 2013
RE-PROPOSED: N/A

DESCRIPTION

Program features include the elimination of minimum rent for an initial time period, streamlined criminal history requirements for household members, and additional streamlining measures implemented using differing rent calculation and eligibility methodologies. On April 1, 2020, SDHC received approval to have VASH payment standards tied to 120% of the three Choice Communities payment standards.

Prior Updates

- FY 2023 – To support ongoing housing stabilization for VASH clients, SDHC extended the \$0 minimum rent requirement.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2012-3. MODIFY FULL-TIME STUDENT DEFINITION

PLAN YEAR: 2012
RE-PROPOSED: N/A

DESCRIPTION

Modifies the full-time student definition to include only students ages 18 to 23 who are not the head, spouse, or co-head. Household members meeting the revised full-time student definition will receive a 100 percent employment income exclusion. All students, regardless of age or familial status, will be eligible for a graduation incentive wherein proof of graduation can be submitted in exchange for a monetary award. The activity utilizes waivers allowing SDHC to calculate rent using alternative methodologies.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2012-2. BIENNIAL REEXAMINATION SCHEDULE

PLAN YEAR: 2012
RE-PROPOSED: N/A

DESCRIPTION

A biennial reexamination schedule for the Work-Able and Elderly/Disabled population implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2016: SDHC converted the Elderly/Disabled population to a Biennial Reexamination Schedule effective July 1, 2015.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2012-1. PATH TO SUCCESS

PLAN YEAR: 2012

RE-PROPOSED: 2014, 2019, 2024

DESCRIPTION

A comprehensive rent reform model utilizing a tiered rent structure with progressive increases to minimum rents. The model eliminates deductions and streamlines allowances. Path to Success only applies to families considered Work-Able. Families defined as Elderly/Disabled receive streamlining measures and are not subject to Path to Success. Rent reform model includes the income verification method of reviewing and averaging the last two month's of income verification via the Verification hierarchy and projecting the annual income based on this verification.

Prior Updates

- FY 2024: Activity was re-proposed to modify the age of elderly from 55 years to 62 years.
- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2019: The activity was re-proposed to increase minimum rents for Work-Able families and modify income bands to \$5,000 for all ranges.
- FY 2014: Re-proposed to include a local portability policy. The local portability policy component of the activity was implemented effective November 1, 2013. The standard HCV calculation may be used in PBV complexes servicing special needs populations.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: Metrics have been updated in the re-proposed activity description.

PLANNED SIGNIFICANT CHANGES: Path to Success has been re-proposed in the FY 2024 MTW Plan to include changes to utility allowance and household age designation.

2011-8. SPONSOR-BASED SUBSIDIES FOR THE HOMELESS

PLAN YEAR: 2011

RE-PROPOSED: 2013, 2017

DESCRIPTION

The local, non-traditional program created using Broader Uses of Funds Authority provides subsidies to individuals identified as homeless. Program participants receive housing and supportive services from sponsor organizations. Update: The Churchill development was allocated 72 sponsor-based subsidies in lieu of project-based vouchers.

Prior Updates

- FY 2017: Re-proposed to streamline the subsidy calculation process using the Path to Success rent calculation, and expands the populations served including both individuals and families. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2017 Plan due to the re-proposal.
- FY 2016: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program. Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. A modified alternate HQS policy will be used for the beds funded through the program.
- FY 2013: Re-proposed to allow SDHC to allocate additional vouchers to the program, broaden the definition of homelessness, and apply MTW flexibilities to the rent calculation methodology.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2011-7. DEVELOPMENT OF PUBLIC HOUSING UNITS USING A COMBINATION OF FUNDS.	<p>DESCRIPTION SDHC creates/preserves public housing, without a competitive process, using acquisition and rehabilitation as the method of development.</p> <p><i>Prior Updates</i></p> <ul style="list-style-type: none"> • FY 2014: Waivers corrected in the Fiscal Year 2012 Report to include MTW Agreement Attachment C, Section B(1)(b)(ii), B(1)(b)(vii) and B(1)(b)(viii) containing waivers of Sections 8 and 9(g)(3) of the 1937 Act and 24 CFR 982 and 990. MTW Agreement Attachment C, Section C (13) containing waivers of 24 CFR 941.40. • FY 2013: This initiative was combined with the Fiscal Year 2010 Public Housing Development activity. <p>PLANNED NON-SIGNIFICANT CHANGES: None PLANNED CHANGES TO METRICS / DATA COLLECTION: None PLANNED SIGNIFICANT CHANGES: None</p>	PLAN YEAR: 2011 RE-PROPOSED: N/A
2011-6. MODIFY EIV INCOME REVIEW SCHEDULE	<p>DESCRIPTION SDHC utilizes the EIV report only when processing full reexaminations of household composition, income, and assets according to the Biennial reexamination cycles. Waivers allow SDHC to adopt and implement policies for verifying family income and determining resident eligibility differing from current program requirements. The requirement to use the EIV report during interim certifications is eliminated.</p> <p>PLANNED NON-SIGNIFICANT CHANGES: None PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate. PLANNED SIGNIFICANT CHANGES: None</p>	PLAN YEAR: 2011 RE-PROPOSED: N/A
2011-4. AFFORDABLE HOUSING DEVELOPMENT	<p>DESCRIPTION Uses Broader Uses of Funds Authority to acquire affordable housing units in San Diego using MTW funds.</p> <p><i>Prior Updates</i></p> <ul style="list-style-type: none"> • SDHC continues to explore viable opportunities to create affordable housing. • FY 2022: Any income that is generated from SDHC-owned properties developed through this initiative will be used for MTW-approved purposes like affordable housing. • FY 2021: Any income that is generated from SDHC-owned properties developed through this initiative will be used for affordable housing purposes. • FY 2020: SDHC is utilizing the initiative to develop accessory dwelling units (ADUs) per local ordinances to increase affordable housing options in the City of San Diego. • FY 2014: Re-proposed to expand the methods of affordable housing development available to SDHC. • FY 2012: Clarify that it will use this authority to preserve as well as acquire affordable housing in the City of San Diego. <p>PLANNED NON-SIGNIFICANT CHANGES: None PLANNED CHANGES TO METRICS / DATA COLLECTION: None PLANNED SIGNIFICANT CHANGES: None</p>	PLAN YEAR: 2011 RE-PROPOSED: 2014



IMPLEMENTED ACTIVITIES

2011-3. TWO YEAR OCCUPANCY TERM FOR PBV TENANTS

PLAN YEAR: 2011
RE-PROPOSED: 2013

DESCRIPTION

Requires Project-Based Voucher holders to complete two years of occupancy before becoming eligible to receive a tenant-based voucher. Waivers allow SDHC to determine waiting list procedures differing from current program requirements. The Mason Hotel and Parker-Kier contracts contain this requirement.

Prior Updates

- FY 2016: The Fiscal Year 2012 Report increased the threshold of the vacancy policy from 15% to 35%, a percent consistent with the baseline vacancy rate. The policy change benefits PBV households.
- FY 2013: Re-proposed to allow SDHC to create a policy stating, "No more than 15% of the tenants in any given development who become eligible to transition to a tenant-based voucher in any given year and no more than 10% in any given month can move from the PBV assisted complex. Policy change effective 2/1/2014.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2011-2. AUTHORIZE COMMITMENT OF PBV TO SDHC- OWNED UNITS

PLAN YEAR: 2011
RE-PROPOSED: N/A

DESCRIPTION

Streamlines the process of committing PBV to agency-owned units by using waivers to allow SDHC to project-base units utilizing a non-competitive process.

Prior Updates

- FY 2015: PBV units were added to the Mason Hotel and Parker-Kier, developments owned by SDHC.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2011-1. ALLOW LOWER RENTS FOR NON-ASSISTED UNITS IN SDHC OWNED DEVELOPMENTS

PLAN YEAR: 2011
RE-PROPOSED: N/A

DESCRIPTION

Uses a revised rent reasonableness protocol to determine rent reasonableness for assisted units in developments owned by SDHC. Rent reasonableness for the voucher assisted units is determined by comparisons to similar units in the surrounding neighborhoods rather than within the development.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2010-9. EXPAND THE PROJECT-BASED VOUCHER PROGRAM

PLAN YEAR: 2010
RE-PROPOSED: 2015

DESCRIPTION

SDHC allocates a greater percent of budget authority to project-based vouchers to serve persons experiencing homelessness and low-income households in the City of San Diego. Authorizations waived allow SDHC to project-base 100 percent of the units in a development; create project-specific waitlists; utilize creative measures to allocate PBV in vacant and foreclosed properties; and designate greater than 20 percent of SDHC's allocation to PBV.

Prior Updates

- FY 2022: New PBV developments focused on Permanent Supportive Housing (PSH) may use Certificates of Occupancy or Temporary Certificates of Occupancy in lieu of an HQS inspections for units. This allows for inspections that have been performed for satisfying Tax Credit or HOME program requirements, as well as inspections by other governmental agencies that are substantially equivalent to HQS requirements. Subsequent inspections shall follow the standard biennial HQS process.
- FY 2021: SDHC changed the rent change period from HAP anniversary month to reexamination month. This will further streamline the process by allowing rent increases to be processed concurrently with the reexamination on the optimized reexamination effective date
- FY 2015: Re-proposed to adopt additional flexibilities to require residents to participate in supportive services as a condition of tenancy; allow project-specific waiting lists maintained by the owners or non-profit providers; approve exception payment standards exceeding 110 percent of the FMR without requiring HUD approval; and increase the number of designated PBV units in a contract after the first three years of the contract have elapsed.

PLANNED NON-SIGNIFICANT CHANGES: In alignment with national best practice and housing first principles, engagement in supportive services is not a condition of tenancy. However, project-based programs that serve special populations are expected to make available a variety of supportive services to best meet a specific population's needs. These expectations are memorialized in contract documents.

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2010-7. ADOPT A LOCAL INTERIM CERTIFICATION POLICY

PLAN YEAR: 2010
RE-PROPOSED: 2012

DESCRIPTION

The local interim policy applies to non-elderly/non-disabled households and limits the number of interim adjustments to income to once in a 12-month timeframe. Additionally, decrease of income interims will be granted only if the loss of income is through no fault of the family, the decreased income results in a decrease to the rent portion greater than 20 percent, the decrease is not due to a sanction on public assistance income, and the family provides verification of eligibility or ineligibility for unemployment benefits if the reduced income is due to loss of employment. If it is determined that a reduction of rent is warranted, the reduced rent will begin the first of the month after receipt of all verifications of decrease and any replacement income.

In order to hold elderly and disabled households harmless, including VASH and EHV, these households may continue to report income decreases as they occur. If the income reduction will last 90 days or more and the reduction of rent is warranted, the reduced rent will begin effective the first of the following month after all verifications are received.

For all households:

When a change of family composition is reported in a timely manner, the effective date of the rent portion changes are as follows:

- Income of newly added household members will be included and increases in the tenant rent due to family changes are effective on the first of the next month, after at least 30- days' notice to the family.
- Decreases in the tenant rent are effective the first of the month following the month in which verifications are received.

When the family composition change is not reported timely by the family, or when there is a mandatory reporting requirement for an income change and it is not reported timely, the effective date of the rent portion changes are as follows:

- Income of newly added household members will be included and the increase in tenant rent will be effective retroactive to the date it would have been effective had it been reported in a timely manner. The family will be liable for any overpaid HAP and may be required to sign a repayment agreement or make a lump sum payment.
- Decreases in tenant rent will be effective on the first of the month following the month that all verifications are received.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2018: Effective July 1, 2018, SDHC eliminated the "No Fault of Your Own" policy as a reason to deny an interim request for a decrease in the rent portion. A review and analysis of the policy indicated minimal benefits.
- FY 2015: The policy applies to work-able families as defined under Path to Success. The activity utilizes the authority to implement an interim certification protocol differing from current mandates, thus allowing for locally driven policies concerning income change interims for families categorized as "Work-Able".
- FY 2012: Re-proposed to adopt a policies stating an interim adjustment of income will not be processed unless the change to the rent portion is greater than 20% and the loss of income must not occur through fault of the family. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2012 Plan Amendment due to the re-proposal.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2010-6. SIMPLIFY INCOME AND ASSET VERIFICATION SYSTEMS TO REDUCE ADMINISTRATIVE BURDEN

PLAN YEAR: 2010
RE-PROPOSED: 2016

DESCRIPTION

Restructures the verification hierarchy, and assets valued at less than \$10,000 are not verified. The activity utilizes the authority to adopt and implement policies to calculate the rent differing from program requirements. At admission and subsequent reexaminations, SDHC accepts self-certification if participant or applicant declares assets to be less than \$100,000 and that they do not own a home suitable for occupancy by the participant or applicant, third-party verification is not required. SDHC also accepts documents provided by applicants and participants without requiring third-party verification at admission or subsequent reexaminations.

Prior Updates

- FY 2016: Re-proposed to eliminate assets from the verification and rent calculation process, gain the ability to deny program admission to applicants owning homes, and incorporate activity 2011-5 into the initiative.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2010-5. STANDARDIZE UTILITY ALLOWANCES BY UNIT SIZE

PLAN YEAR: 2010
RE-PROPOSED: N/A

DESCRIPTION

A simplified utility allowance structure where the utility allowance amount is based on whether or not the family is responsible for the water portion of the utilities. The activity utilizes the authority to adopt and implement policies to calculate the rent differing from program requirements.

PLANNED NON-SIGNIFICANT CHANGES: SDHC proposes to eliminate utility reimbursement payments and the utility allowance schedule requirement and remove the requirement to collect, analyze, and report information on utility responsibilities for all households participating in Path to Success.

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2010-4. CHOICE COMMUNITIES

PLAN YEAR: 2010
RE-PROPOSED: 2012, 2018

DESCRIPTION

Using the authority to implement a reasonable policy to establish payment standards differing from current program requirements, the poverty de-concentration effort providing incentives for families to move to one of nine local opportunity areas by using the following:

1. Moving for Opportunity Program
2. Revolving Security Deposit Loan fund
3. Increase payment standards in low-poverty areas

Prior Updates

- FY 2018: Re-proposed to increase flexibility related to determining payment standards. Payment standards are informed by hypothetical SAFMRs published by HUD, the information available at the time of the analysis.
- FY 2016: A Fiscal Year 2015 activity increased the rent burden to 50 percent program wide. Thus, the component eliminating the 40 percent rent burden is eliminated.
- FY 2012: Re-proposed to adopt a policy allowing SDHC to calculate payment standards below 90% of the FMR in high-poverty areas.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2010-2.

**AUTHORIZE THE
SDHC TO INSPECT
AND DETERMINE
RENT
REASONABLENESS
FOR SDHC OWNED
PROPERTIES**

**PLAN YEAR: 2010
RE-PROPOSED: N/A**

DESCRIPTION

Utilizes a local procedure to conduct inspections and determine rent reasonableness for SDHC-owned properties are conducted by SDHC.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2010-1.

**IMPLEMENT A
REVISED INSPECTION
PROTOCOL**

**PLAN YEAR: 2010
RE-PROPOSED: N/A**

DESCRIPTION

The modified inspection protocol reduces the number of required inspections by placing qualifying units on a Biennial Inspection Cycle and allowing owners to self-certify Housing Quality Standards for minor fail items.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2016: Through the initiative, SDHC will modify the requirements to "gain entry" into every 24 months to make a "first attempt to access" the unit every 24 months to comply with Federal requirements.
- FY 2015: Modified the activity to remove the qualifying criteria and authorize placement of all MTW units onto a Biennial Inspection Cycle.
- FY 2014: Results for HQS inspections occurring before implementation of the activity may not be considered for purposes of placement on the biennial inspection cycle.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



NOT YET IMPLEMENTED ACTIVITIES

**2023-1. BLENDED
SUBSIDIES IN
FAIRCLOTH-TO-RAD
CONVERSIONS**

PLAN YEAR APPROVED: 2023

RE-PROPOSED: N/A

DESCRIPTION

SDHC received permission for blended subsidies using MTW funds for Faircloth to RAD conversions. SDHC has been actively involved in creating and preserving additional affordable housing within the City of San Diego in other approved MTW activities through acquisitions, rehabilitations, and new developments. In addition, SDHC has an active activity relating to public housing development. Documentation from the PIH office of Capital Improvements, as of September 30, 2021, showed that SDHC had an availability of 1,220 units remaining under the Faircloth limit. Due to the remaining units in SDHC's Faircloth cap, SDHC is actively researching opportunities where a Faircloth-to-RAD conversion would be feasible. This activity would be utilized to make up the difference between the combined tenant paid portion and the RAD HAP subsidy up to the contract rent for converted units.

IMPLEMENTATION DATE TIMELINE: None**STATUS UPDATE:** SDHC is actively reviewing options to implement this activity.**DESCRIPTION OF NON-SIGNIFICANT CHANGES/MODIFICATIONS SINCE APPROVAL:** None

ACTIVITIES ON HOLD

**2010-8. ESTABLISH
AN HCV
HOMEOWNERSHIP
PROGRAM**

PLAN YEAR APPROVED: 2010

IMPLEMENTATION DATE: OCT 01, 2009

RE-PROPOSED: N/A

HOLD DATE: JUL 01, 2014

DESCRIPTION

A homeownership program was created to assist income-eligible HCV participants with purchasing a home. Housing assistance payments are utilized to assist with a mortgage payment rather than as a rental payment. Incentives to purchase a foreclosed home are also program components. Waivers were enacted to modify the eligibility requirements for the program related to the minimum monetary threshold for savings accounts as well as implement the incentives for purchasing foreclosed homes.

REASON PLACED ON HOLD

The program was placed on hold due to decreasing housing stock and the resulting increasing housing prices, thus creating a housing market no longer accessible to low-income Housing Choice Voucher participants. New applications were no longer be accepted effective July 1, 2014 for the program. Families currently participating in the homeownership program continue to receive assistance.

STATUS UPDATE: None**ANTICIPATED REACTIVATION TIMELINE**

SDHC will evaluate the program annually to determine the feasibility of re-activating the program. Criterion to be evaluated will include the level of available housing stock, median housing prices, and the administrative capacity to increase the number of Housing Choice Voucher homeowners.

EXPLANATION OF NON-SIGNIFICANT CHANGES / MODIFICATIONS: Not Applicable



CLOSED OUT ACTIVITIES

2014-4. Housing Subsidy Program for Homeless Youth.....	34
2014-1. Transitional Subsidy Program for Homeless Veterans.....	34
2013-9. New Public Housing Transition	34
2013-5. Homeless Veteran Project-Based Subsidy Program	34
2013-3. Elimination of 100% Excluded Income from the Income Verification Process	34
2012-4. Project-Based Subsidy Program for the Homeless	35
2011-10. Broader Uses of Funds for IDAs	35
2011-9. Enhance Family Self-Sufficiency Program	35
2011-5. Disregard Retirement Accounts.....	35
2010-10. Undertake Public Housing Development.....	35
2010-3. Triennial Reexaminations for Elderly and Disabled Households	35
2009-1. Achievement Academy of the San Diego Housing Commission	36



CLOSED OUT ACTIVITIES

2014-4. HOUSING SUBSIDY PROGRAM FOR HOMELESS YOUTH	PLAN YEAR APPROVED: 2014 RE-PROPOSED: N/A	IMPLEMENTATION DATE: N/A DATE CLOSED OUT: JULY 1, 2022
	DESCRIPTION Using Broader Uses of Funds Authority, SDHC created a time-limited pilot program to provide flat housing subsidies while a partnering agency delivers supportive services such as job placement, education, training, and case management.	
	REASON(S) CLOSED OUT The activity was not implemented. SDHC published several competitive solicitations to procure a partner agency without success. Due to the inability to award a contract, SDHC closed out the activity.	
2014-1. TRANSITIONAL SUBSIDY PROGRAM FOR HOMELESS VETERANS	PLAN YEAR APPROVED: 2014 RE-PROPOSED: N/A	IMPLEMENTATION DATE: JAN 01, 2014 DATE CLOSED OUT: OCT 01, 2014
	DESCRIPTION Using Broader Uses of Funds Authority, SDHC partners with Veteran's Village of San Diego (VVSD) to craft a transitional housing program using flat subsidies paired with supportive services. SDHC provides the housing subsidy while VVSD provides the supportive services.	
	REASON(S) CLOSED OUT Veteran's Village of San Diego, the intended partnering agency for the program, indicated a preference to pursue an alternative rental subsidy program.	
2013-9. NEW PUBLIC HOUSING TRANSITION	PLAN YEAR APPROVED: 2013 RE-PROPOSED: N/A	IMPLEMENTATION DATE: N/A DATE CLOSED OUT: SEP 30, 2013
	DESCRIPTION Families transitioning out of a state-aided rental assistance program (25% TTP) to the public housing program (30% TTP) receive a transition period during which the families pay more than 25 percent but less than 30 percent of adjusted household income toward the rent portion before moving to 30 percent at the end of the transition period.	
	REASON(S) CLOSED OUT The flexibility requested under this initiative will not be required.	
2013-5. HOMELESS VETERAN PROJECT- BASED SUBSIDY PROGRAM	PLAN YEAR APPROVED: 2013 RE-PROPOSED: N/A	IMPLEMENTATION DATE: N/A DATE CLOSED OUT: SEP 30, 2013
	DESCRIPTION Creates a local, non-traditional project-based subsidy pilot program to provide housing to veterans who are either not yet ready to enter a more regulated program or who temporarily exit a program. SDHC partners with Veteran's Village of San Diego for this activity.	
	REASON(S) CLOSED OUT Veteran's Village of San Diego determined the activity as neither economically advantageous nor viable under current circumstances and requested permission to close out the activity.	
2013-3. ELIMINATION OF 100% EXCLUDED INCOME FROM THE INCOME VERIFICATION PROCESS	PLAN YEAR APPROVED: 2013 RE-PROPOSED: N/A	IMPLEMENT DATE: SEP 01, 2012 DATE CLOSED OUT: JULY 01, 2020
	DESCRIPTION Removes the requirement to verify and enter excluded income into the rent calculation formula and subsequently on the HUD 50058.	
	REASON(S) CLOSED OUT Activity had originally been reactivated due to the expiration of PIH Notice 2013-03. A Final Rule FR 5743-F-03 was published, reactivating the streamlining measure.	

SECTION IV – APPROVED MTW ACTIVITIES



2012-4. PROJECT-BASED SUBSIDY PROGRAM FOR THE HOMELESS	PLAN YEAR APPROVED: 2012	IMPLEMENTATION DATE: N/A
	RE-PROPOSED: N/A	DATE CLOSED OUT: DEC 31, 2014
	DESCRIPTION Using Broader Uses of Funds Authority, SDHC created a program which provides a flat subsidy based on the number of authorized units in the development; all program administration is performed by the development owner with monitoring and auditing performed by SDHC.	
	REASON(S) CLOSED OUT SDHC determined the program structure as not advantageous to the agency's approach to ending homelessness on the City of San Diego. Efforts are focused in other development capacities.	
2011-10. BROADER USES OF FUNDS FOR IDAS	PLAN YEAR APPROVED: 2011	IMPLEMENTATION DATE: JUL 01, 2010
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUN 30, 2011
	DESCRIPTION SDHC received permission to utilize MTW broader use of funds authority to subsidize IDAs not authorized by federal regulations.	
	REASON(S) CLOSED OUT The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority, but rather single-fund flexibility. The activity is no longer active.	
2011-9. ENHANCE FAMILY SELF-SUFFICIENCY PROGRAM	PLAN YEAR: 2011	IMPLEMENTATION DATE: OCT 01, 2010
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUL 01, 2014
	DESCRIPTION In the event the head of household is unable to enroll in the FSS program (such as due to a disability), an adult household member may enroll in the program as the sole participant.	
	REASON(S) CLOSED OUT Per HUD's recommendation, the initiative will be combined with the FSS Reinvention activity via a re-proposal in the Fiscal Year 2015 MTW Annual Plan.	
2011-5. DISREGARD RETIREMENT ACCOUNTS	PLAN YEAR: 2011	IMPLEMENTATION DATE: AUG 01, 2010
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUN 30, 2015
	DESCRIPTION SDHC disregards retirement accounts when verifying an applicant or participant's assets.	
	REASON(S) CLOSED OUT The re-proposal of activity 2010-6 wherein assets are eliminated from the rent calculation eliminates the need for the activity.	
2010-10. UNDERTAKE PUBLIC HOUSING DEVELOPMENT	PLAN YEAR: 2010	IMPLEMENTATION DATE: JUL 01, 2010
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUN 30, 2011
	DESCRIPTION/UPDATE Acquire, rehabilitate, or produce housing units as public housing.	
	REASON(S) CLOSED OUT This activity was closed out in the Fiscal Year 2011 MTW Report. Public Housing development will occur under the Fiscal Year 2011 Public Housing Development initiative which combines the authorizations and flexibilities.	
2010-3. TRIENNIAL REEXAMINATIONS FOR ELDERLY AND DISABLED HOUSEHOLDS	PLAN YEAR: 2010	IMPLEMENTATION DATE: OCT 01, 2009
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUL 01, 2015
	DESCRIPTION/UPDATE Allows families defined as Elderly/Disabled to participate in a Triennial Reexamination Cycle. COLA updates to social security and veteran's benefits are processed in the "off" years. The activity was implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.	
	REASON(S) CLOSED OUT SDHC closed out the activity to streamline the reexamination process for Path to Success participants and rental assistance staff. Multiple reexamination processes for households proved difficult to administer when population changes occurred between Work-Able and Elderly/Disabled households. Path to Success households are placed on a biennial reexamination process effective with July 2015 reexamination. The PBV and FUP programs remain on an annual reexamination cycle.	

SECTION IV – APPROVED MTW ACTIVITIES



2009-1. ACHIEVEMENT ACADEMY OF THE SAN DIEGO HOUSING COMMISSION	PLAN YEAR: 2009	IMPLEMENTATION DATE: OCT 01, 2010
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUN 30, 2011
	DESCRIPTION/UPDATE The SDHC Achievement Academy, formerly known as the Economic Development Academy, offers a broad range of one-on-one services and workshops geared toward workforce preparation, financial literacy, and homeownership education.	
	REASON(S) CLOSED OUT The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority. The activity is ongoing but reported as a single fund flexibility activity in Section 5 of the Plan	



SECTION V – SOURCES AND USES OF MTW FUNDS

ESTIMATED SOURCES AND USES OF MTW FUNDS

I. ESTIMATED SOURCES OF MTW FUNDS

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

SOURCES		
FDS LINE ITEM	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	TOTAL TENANT REVENUE	\$0
70600	HUD PHA OPERATING GRANTS	\$297,223,800
70610	CAPITAL GRANTS	\$0
70700 (70710+70720+70730+70740+70750)	TOTAL FEE REVENUE	\$0
71100+72000	INTEREST INCOME	\$0
71600	GAIN OR LOSS ON SALE OF CAPITAL ASSETS	\$0
71200+71300+71310+71400+71500	OTHER INCOME	\$10,710,566
70000	TOTAL REVENUE	\$307,934,366

II. ESTIMATED USES OF MTW FUNDS

The MTW PHA shall provide the estimated uses and amount of MTW funding by Financial Data Schedule (FDS) line item.

SOURCES		
FDS LINE ITEM	FDS LINE ITEM	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	TOTAL OPERATING - ADMINISTRATIVE	\$14,965,627
91300+91310+92000	MANAGEMENT FEE EXPENSE	\$0
91810	ALLOCATED OVERHEAD	\$10,691,438
92500 (92100+92200+92300+92400)	TOTAL TENANT SERVICES	\$1,085,728
93000 (93100+93600+93200+93300+93400+93800)	TOTAL UTILITIES	\$0
93500+93700	LABOR	\$0
94000 (94100+94200+94300+94500)	TOTAL ORDINARY MAINTENANCE	\$996
95000 (95100+95200+95300+95500)	TOTAL PROTECTIVE SERVICES	\$2,075
96100 (96110+96120+96130+96140)	TOTAL INSURANCE PREMIUMS	\$258,679
96000 (96200+96210+96300+96400+96500+96600+96800)	TOTAL OTHER GENERAL EXPENSES	\$16,210,808
96700 (96710+96720+96730)	TOTAL INTEREST EXPENSE AND AMORTIZATION COST	\$0
97100+97200	TOTAL EXTRAORDINARY MAINTENANCE	\$0
97300+97350	HOUSING ASSISTANCE PAYMENTS + HAP PORTABILITY-IN	\$264,719,015
97400	DEPRECIATION EXPENSE	\$0
97500+97600+97700+97800	ALL OTHER EXPENSES	\$0
90000	TOTAL EXPENSES	\$307,934,366

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

III. DESCRIPTION OF PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

SDHC utilizes single-fund flexibility to fund the Achievement Academy and to provide funding for services in support of the Community Action Plan on Homelessness and the SDHC Housing Intervention Continua. The Achievement Academy is a learning and skills center available to families participating in the Housing Choice Voucher and Public Housing programs. Programs offered at the Achievement Academy are geared to workforce readiness and financial literacy. The Family Self-Sufficiency program is another component of the Achievement Academy. Please note: Individual Development Accounts are no longer funded with MTW single-fund flexibility. Please see the following pages for a thorough discussion of each activity.



SINGLE FUND FLEXIBILITY NARRATIVE

ENVISION CENTER DEMONSTRATION PROGRAM

In June of 2018, HUD announced the designation of EnVision Centers in 17 communities across the nation. SDHC was selected for the only location in California, and only one of three co-located within a designated Promise Zone.

Initially implemented with two locations to provide client flexibility, the Southeast San Diego location closed due to the pandemic. The SDHC Achievement Academy location is temporarily closed to in-person participation while staff members continue to work remotely. In response to the COVID-19 pandemic, the SDHC Achievement Academy began offering meetings and workshops by video conference. The change in service delivery made programs more accessible and convenient for many clients, resulting in increased participation in workshops and programmatic events. Services continue to be offered online, with some activities available at alternate in-person sites, such as local libraries or specific program training locations. EnVision Center services are available to any households with low income in the City of San Diego, predominately SDHC rental assistance participants, public housing residents and participants in certain homelessness programs.

EnVision Centers leverage public and private resources to help clients achieve goals to secure economic security. To foster long-lasting self-sufficiency, EnVision Centers provide support in the following four areas of focus: Economic Empowerment; Education; Health/Wellness; and Character/Leadership.

FAMILY SELF-SUFFICIENCY: EDEN HOUSING INC.

In November 2020, the SDHC Achievement Academy signed a contract with Eden Housing, Inc., a California nonprofit public benefit corporation, to implement a Family Self-Sufficiency (FSS) program at two of its San Diego properties. This marks the first time HUD has authorized a public housing authority to run an FSS program for a private multifamily developer. The FSS program will operate under HUD's guidelines for the traditional five-year program and not the Achievement Academy's MTW approved two-year program.

ACHIEVEMENT ACADEMY

SDHC uses single-fund flexibility in support of MTW activities to enhance self-sufficiency programming. SDHC combines funds from public housing operating and capital fund assistance (authorized by section 9 of the United States Housing Act of 1937 [the Act]) and voucher funds (authorized by section 8 (o) of the Act) to implement a block grant/single-fund budget approach to budgeting and accounting. SDHC has consolidated public housing and HCV program funds to implement the approved Moving to Work initiatives described in previously approved MTW Plans and will continue to do so in future Plans.

SDHC uses single-fund flexibility to conduct a variety of activities geared toward self-sufficiency. The Achievement Academy offers a broad range of one-on-one services and workshops geared toward workforce readiness and financial literacy. Partnerships with a variety of external organizations specializing in their fields enable SDHC to provide assistance to participants with different interests, career focuses, and skill levels. Leveraging funding from outside sources increases the services provided to participants. When possible, staff looks for grants that provide funding and coaching to assist both staff and participants. Following the Financial Opportunity Center (FOC) model, created by funding from the Local Initiatives Support Corporation (LISC), the Achievement Academy is able to provide robust services to participants that go beyond job leads and help support self-sufficiency. The resources offered at the Achievement Academy are a vital component of the Path to Success rent reform activity as participants are incentivized to increase income and work towards self-sufficiency. SDHC plans to continue and grow these partnerships to better serve our families and increase economic self-reliance. The narrative below describes some of the services offered at the Achievement Academy.

It is worth noting that while the COVID-19 pandemic temporarily disrupted and altered the Achievement Academy's service delivery model, it did not prevent services from reaching clients in new and creative ways. Like most businesses across the country and elsewhere, SDHC Achievement Academy staff quickly reworked in-person meetings and workshops to Zoom or other online platforms. The change in service delivery proved to be more accessible and convenient for many clients resulting in increased participation in workshops and programmatic events.

SECTION V – SOURCES AND USES OF MTW FUNDS



EMPLOYMENT/WORKFORCE DEVELOPMENT

Job Developer

One of the Achievement Academy Workforce Readiness Specialist (WRS) positions serves as a job developer and makes connections with employers of in-demand occupations; organizes job fairs; and coordinates employment services with partner organizations. Training for participants covers such topics as on-line job search, résumé writing, interviewing tips, and customer service. The Achievement Academy also partners with Manpower, an industry leader in employment services. Manpower helps to leverage connections in the business community to help open doors to companies that typically have been a struggle for participants to get into in the past.

One-Stop Career Center

The San Diego Workforce Partnership (SDWP) provides services via a satellite One-Stop Career Center at the local downtown public library. SDWP staff offers workforce development services including labor market information, career development, assessment, job search/retention skills, job placement assistance, and referrals to training opportunities.

Small Business Development Training

The SDHC Achievement Academy partners with Access to support entrepreneurs who want to start or expand a small business. Microenterprise services and training offered to clients include creating, or expanding, a business plan; obtaining a business license; one-on-one business counseling; market training & research; and financial literacy support among other services.

Employment/Workforce Development Workshops

The SDHC Achievement Academy offers employment readiness workshops and provides access to temporary and permanent employment through employer connections. Workshops include: Returning to the Workforce; The Job Search Rollercoaster; Teamwork Skills Everyone Needs; and 10 Keys for Professional Success among others. The Achievement Academy also hosts recruitment fairs via Zoom. Participants are invited to presentations from hiring organizations and hear directly from human resources representatives how to get hired at their company. Topics covered range from the job application and résumé submittal process to interview preparedness and communication skills. Many of the participating recruitment organizations guarantee, at minimum, an interview to SDHC clients.

Youth Programs

Staff at the Achievement Academy strives to offer innovative programming in an effort to keep participants interested and engaged. One WRS position focuses on developing programming for “opportunity youth”, defined as young adults between sixteen and twenty-four years of age who are not working and not enrolled in school. Students receive education counseling or career guidance. The Achievement Academy has partnered with Access, Inc. to provide additional training and services to these young adults.

Academy Computer Lab

The SDHC Achievement Academy computer lab is currently closed to in-person activity as staff continues to work remotely. During the early shutdown of the pandemic SDHC partnered with Computers2Kids to provide laptops to assist with digital access to SDHC families. This partnership, made possible with a grant from the Local Initiatives Support Corporation (LISC), allows families to participate in on-line school and job search activities. Currently, families are referred to local libraries where free Wi-Fi devices and equipment may be checked out.

INCOME SUPPORTS

Benefits Screening

SDHC Achievement Academy staff work with clients on benefits screening. Application assistance is currently offered for an array of program such as CalWorks, Women Infants and Children (WIC), California Healthy Families, Child Care Assistance, MediCal, and Supplemental Nutrition Assistance Program (SNAP). Additionally, clients are referred to Dreams for Change for tax assistance programs.

FINANCIAL EDUCATION

Financial Coaching

The Achievement Academy has been able to have several WRS positions trained as certified Financial Counselors. The Financial Counselors offer credit counseling in debt reduction, credit repair, budgeting, and cash management skills. These services have been incorporated into the FOC service delivery model utilized within the Achievement Academy.

SECTION V – SOURCES AND USES OF MTW FUNDS



Financial Skills Education Workshops

Financial Education workshops are routinely offered in the following topic areas: Debt and credit repair; credit score improvement; controlling expenses; maintaining a financial fitness plan; electronic banking and direct employee deposits; budget management, ordering, reviewing, and repairing credit report; investments strategies and options; and pensions/retirement planning.

Financial Coaching Training

SDHC WRS staff utilize the LISC Financial Counseling Model to implement innovative coaching methods during one-on-one appointments with participants. SDHC is also positioned to assist participants with improving credit through a partnership with Credit Builders Alliance. The ability to internally pull credit reports allows SDHC to further assist participants with accessing current credit ratings in order to begin aligning client goals for credit improvement to future financial and career goals.

The chart below contains a summary of the results of Achievement Academy activities at the close of Fiscal Year 2023.

ACHIEVEMENT ACADEMY			
METRIC	BASELINE	OUTCOME	BENCHMARK ACHIEVED?
Number of rental assistance participants receiving core services	982	1,156	Yes
Number of rental assistance participants with an increase in earnings	229	312	Yes
Number of rental assistance participants placed in employment	144	230	Yes
Number of rental assistance participants employed for 12 or more consecutive months	44	31	No
Number of rental assistance participants who attended a work readiness workshop	727	603	Yes
Percent of rental assistance participants who attended a recruitment and resource fair and obtained employment as a direct result	0%	25.7%	Yes
Number of rental assistance participants who completed vocational or bridge training	0	0	Yes

FLEXIBLE FUNDING FOR SUPPORTIVE SERVICES

In addition to the Achievement Academy, SDHC utilizes MTW funds to provide supportive services that would align with the City of San Diego's Community Action Plan on Homelessness. The Community Action Plan on Homelessness identified a homeless-crisis-response-system service gap. Households can often present in significant crisis, and in the early stage of the crisis presentation it can be challenging to determine whether the homelessness/housing crisis is due to situational or structural factors/barriers in the household/individual. Flexible funding used towards supportive services, in this instance, help fund a central point of contact and centralized resources for households as they move between the various programs available.

Examples of supportive services that SDHC seeks to provide via flexible funding include, but are not limited to:

- Centralized Case Management
- Mental Health Services
- Physical Healthcare Services
- Behavioral Healthcare
- Substance Use Services



- Life Skills Training
- Education Services
- Employment Assistance
- HIV Services

This flexible supportive services approach creates individualized emergency intervention and housing planning for the household/individual to best meet the participant's needs with a focus on aligning the right level of intervention with the critical need, promoting self-sufficiency and identifying the best resource to help participants thrive and overcome both situational and structural barriers to long-term housing stability.

For example, SDHC has drafted a Housing Intervention Continua, which delves into how at-risk populations can be served via centralized resources if funded via this proposed activity. The Continua contains multiple approved local non-traditional MTW activities, in which case management is operated separately. Currently, if a household moves from one program to another, this could necessitate a change in who their point of contact is. This continua could utilize flexible funding to focus on using centralized case management in order to help households more successfully navigate available programs, which includes Homeless Shelter Beds, Prevention and Diversion Programs, Moving Home, Sponsor-Based Subsidies, as well as the Achievement Academy and other approved programs. In this instance, centralized case management would remain with participating household from the beginning and continue with them in order to direct which program is most appropriate for their situation. Flexible funding would ensure that even if the household move into another housing program, their case management point of contact would remain with them until exit.

While funding for supportive services within the aforementioned Homeless Housing Continua could be an immediate use of the activity, it is expected that flexible funding for supportive services could also be used towards other households and programs eligible for assistance from SDHC. In addition, funding may be utilized to support administrative staff whose main job duties are to develop, monitor, or support efforts that align with this initiative and SDHC's commitment to further progress towards goals of the Community Action Plan on Homelessness for the City of San Diego. Another potential application SDHC recently encountered occurred during an acquisition using CARES Act funding. While funding was available for the acquisition, the supportive services that were needed were not included. This, if approved, could be used to bridge similar gaps encountered in the acquisition and development process based on other funding sources used.

Another example could be providing assistance to households in obtaining broadband access that is increasingly necessary for education and remote work opportunities, this could include flexible funding for tenant-based households or the use of funds to provide high speed internet access at SDHC-owned and/or controlled properties. As a result of the COVID-19 pandemic, in the City of San Diego, there has been an expansion of remote learning opportunities that may persist for educational outreach after a return to in person classes. Remote learning and conferencing often requires video capabilities, which means that broadband access is required. Not all households have access to this resource, and flexible funding could help provide for households in need in order to prevent a long-term disadvantage. In addition, families with children that would have access would also help their parents or guardians in additional access to job search resources, as well as provide them the ability to work possibly work remotely.

Flexible funding would help to fund case management staff and financial assistance to stabilize a household's immediate housing crisis. Coupled with financial assistance to address immediate needs, case management helps to minimize the negative impact of unstable housing for individuals and families who are at risk of or actively experiencing homelessness. Prevention and Diversion assistance is individualized to each household's unique needs and stabilization activities may include:

- Short-term, light-touch case management
- Housing search assistance
- Financial literacy resources



- Workforce readiness resources
- Landlord/roommate conflict mediation
- Connection to services and/or public assistance benefits

PREVENTION/DIVERSION

SDHC will utilize MTW flexible funds to provide services that reduce the inflow into the current homelessness system through prevention and diversion. Prevention and Diversion services strive to prevent homelessness before it occurs as well as to divert individuals who are experiencing homelessness to other housing opportunities outside of the region's homeless crisis response system. Prevention and Diversion is aligned with the Housing First model of addressing homelessness, an approach to successfully connect households at risk of or experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. Preventing or shortening an episode of homelessness for individuals and families greatly reduces the likelihood of another occurrence of housing instability or progression to chronic homelessness. Further, these efforts also help minimize the impact for overburdened shelter systems in San Diego. In addition to supportive services through case management, Prevention and Diversion utilizes financial assistance in the form of rent, rent arrears, utility payments, security deposits and application fees to stabilize housing for individuals and families facing a housing crisis. Depending on the nature of the housing crisis being addressed through our Prevention and Diversion programs, SDHC may choose to use habitability checks in lieu of HQS inspections.

LANDLORD ENGAGEMENT AND ASSISTANCE PROGRAM (LEAP)

SDHC will utilize MTW flexible funds to the Landlord Engagement and Assistance Program or LEAP, which aims to increase access to the existing market of available units for individuals and families experiencing homelessness. LEAP is aligned with the Housing First model of addressing homelessness, an approach to successfully connect households experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. Depending on the nature of the housing crisis being addressed, SDHC may choose to use habitability checks in lieu of HQS inspections.

LEAP works directly with landlords and property management companies within the City of San Diego to help move individuals and families into housing quickly. LEAP offers incentives to landlords as well as the Landlord Contingency Fund and landlord liaison services. Flexible funding used towards LEAP services would help to fund a SDHC staff landlord liaison, support to individuals and families to identify housing units and financial assistance for them to pay move-in costs like security deposits including holding fees, application fees, utility assistance, rent arrears and vacancy loss.

SECTION V – SOURCES AND USES OF MTW FUNDS



IV. PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

ORIGINAL FUNDING SOURCE	BEGINNING OF FY – UNSPENT BALANCES	PLANNED APPLICATION OF PHA UNSPENT FUNDS DURING FY
HCV HAP*	\$26,861,326	\$26,861,326
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$1,321,109	\$1,321,109
TOTAL:	\$28,182,435	\$28,182,435

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

SDHC anticipates HCV HAP unspent balance will be used to cover increased voucher costs due to utilization rate being greater than 100%; to cover program administration cost; to fund the acquisition, preservation, and renovation of affordable housing units in the City of San Diego; and to fund local non-traditional including homelessness programs costs.

Public Housing unspent fund balances are operating and replacement reserves related to SDHC regulatory agreement with the Department of Housing and Community Development, a public agency of the State of California, for public housing projects CA063000009 and CA063000010.

* Unspent HAP funding should not include amounts recognized as Special Purpose Voucher reserves

**HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan

LOCAL ASSET MANAGEMENT PLAN

Did the MTW PHA allocate costs within statute in the Plan Year?

Yes

Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

No

Did the MTW PHA provide a LAMP in the appendix?

No

If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

SDHC did not operate a Local Asset Management Plan during Fiscal Year 2023

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

DESCRIPTION OF RAD PARTICIPATION

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

Rental Assistance Demonstration (RAD) Participation Description:

N/A

Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

N/A

If the MTW PHA has provided RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A



SECTION VI - ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

See Appendix A

B. DOCUMENTATION AND PUBLIC PROCESS

See Appendix B

C. PLANNED OR ONGOING EVALUATIONS

There are no planned or ongoing evaluations

D. LOBBYING DISCLOSURES

See Appendix C



PUBLIC NOTICE – SAN DEIGO UNION TRIBUNE



PUBLIC NOTICE - SAN DIEGO VOICE



PUBLIC NOTICE – EL LATINO



APPENDIX C: LOBBYING DISCLOSURES

DISCLOSURE OF LOBBYING ACTIVITIES

OMB Control Number: 4040-0013

Expiration Date: 2/28/2025

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

1. * Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee * Name: San Diego Housing Commission * Street 1: 1122 Broadway, Ste. 300 * Street 2: * City: San Diego State CA: California Zip: 92101 Congressional District, if known: CA-53		
5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:		
6. * Federal Department/Agency: U.S. Dept. of Housing and Urban Dev.	7. * Federal Program Name/Description: Fiscal Year 2025 Moving to Work (MTW) Block Grant CFDA Number, if applicable:	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ 277,525,125.00	
10. a. Name and Address of Lobbying Registrant: Prefix: * First Name: M/A Middle Name: * Last Name: M/A Suffix: * Street 1: Street 2: * City: State: Zip:		
b. Individual Performing Services (including address if different from No. 10a) Prefix: * First Name: M/A Middle Name: * Last Name: M/A Suffix: * Street 1: Street 2: * City: State: Zip:		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the law above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. * Signature: [Redacted] * Name: [Redacted] * First Name: Last Middle Name: * Last Name: Jones Suffix: Title: President & CEO Telephone No.: Date: 12/14/2023		
Federal Use Only:		STANDARD FORM LLL (REV. 7/1997) Authorized for Local Reproduction



APPENDIX D: NON-MTW RELATED SDHC INFORMATION

STATE FUNDING FOR HOMELESSNESS OUTREACH

The State of California allocated \$750,000 in its Fiscal Year 2023-2024 budget to SDHC for SDHC's Multidisciplinary Outreach Program to address homelessness. California State Assemblymember Brian Maienschein advocated for these funds.

This Multidisciplinary Outreach Program serves individuals and families who are among the most vulnerable people experiencing unsheltered homelessness in the City of San Diego. The program focuses on people experiencing unsheltered homelessness who are among the highest utilizers of the criminal justice, emergency services or homelessness services systems. Many are chronically homeless, living with untreated medical and behavioral health conditions and have not been stably housed in years despite attempts by other programs to serve them. Outreach to these individuals requires more time and attention than other programs. The additional funding from the State will enable the program to assist additional individuals experiencing homelessness.

The outreach team includes a nurse practitioner, outreach specialists, a medical assistant, peer support specialists and a substance-abuse counselor. SDHC contracts with People Assisting the Homeless (PATH) to operate the program. PATH subcontracts with Father Joe's Villages.

Assemblymember Maienschein, San Diego Mayor Todd Gloria and San Diego City Council President Sean Elo-Rivera announced the state funds at a media event in October.



Multidisciplinary Outreach Program – State Funding Announcement
October 5, 2023

APPENDIX D: NON-MTW RELATED SDHC INFORMATION



EXPANDING HOMEOWNERSHIP OPPORTUNITIES FOR PEOPLE OF COLOR

Help to navigate the process necessary to become first-time homebuyers is a phone call or email away for middle-income Black, Indigenous, People of Color (BIPOC) households through a joint effort of the San Diego Housing Commission (SDHC) and the San Diego Homeownership Equity Collaborative.

In September 2023, SDHC announced a dedicated phone number and email address to connect households of color with a Homeownership Advisor who works for SDHC. The Homeownership Advisor helps homebuyers of color by answering their questions; performing an initial assessment of their financial preparedness; and referring and connecting them to organizations for services, such as more in-depth evaluation of financial readiness, financial coaching, developing a plan to be ready for a mortgage, increasing their credit score, managing debt and overcoming financial challenges.

Major funding for the Homeownership Advisor is from the Wells Fargo Foundation's Wealth Opportunities Realized Through Homeownership (WORTH) initiative. Wells Fargo awarded a \$7.5 million WORTH grant to SDHC, on behalf of the San Diego Homeownership Equity Collaborative, to help create 5,000 new homeowners of color in San Diego County by the end of 2025.

STATE FUNDING: \$45 MILLION TO CREATE AFFORDABLE HOMES

Proposed developments that would create more than 1,180 affordable homes would receive financial support through a \$45 million grant the State of California awarded to SDHC.

The state awarded SDHC the maximum amount available for large cities through the grant program. SDHC applied for the grant on behalf of the City of San Diego.

The state program made grants available to fill gaps in financing for infrastructure and improvements to existing buildings that are necessary for specific residential or mixed-use projects in urban areas, known as infill developments. The projects funded as part of San Diego's application build upon policies pioneered by the City of San Diego to address housing affordability, including using surplus state land, building on underused land at a trolley stop owned by the Metropolitan Transit System, and leveraging a local community land trust. The SDHC Board of Commissioners on April 6, 2023, authorized SDHC to apply for the grant.

According to the California Department of [Housing and Community Development](#), which administers the state grant program, the grant awarded to SDHC will fund site preparation, including demolition, excavation, grading, soil stabilization, erosion control, weed control, and dewatering. Surface improvements will include concrete paving and traffic signals. In addition, the funds will support new residential parking for the housing developments, and transit investments will fund new pathways, bus shelters, and bike facilities.

'SENIORS SAFE AT HOME' INITIATIVE

SDHC is collaborating with Serving Seniors and the Lucky Duck Foundation, with support from the City of San Diego, on a new program known as "Seniors Safe at Home." This program will help seniors aged 55 and older with low income, experiencing a housing crisis and at risk of homelessness.

San Diego City Council President Sean Elo-Rivera, who chairs the Housing Authority of the

APPENDIX D: NON-MTW RELATED SDHC INFORMATION



City of San Diego, County of San Diego Board of Supervisors Chair Nora Vargas, Serving Seniors President & CEO Paul Downey, and Lucky Duck Foundation Executive Director Drew Moser announced the program at a news conference on September 29.

The program will provide time-limited case management and a specific rental assistance amount per month for eligible, participating seniors. SDHC will receive referrals from SDHC's HOUSING FIRST - SAN DIEGO phone hotline and determine household eligibility. SDHC will process the rental assistance payment and refer the household to Serving Seniors for ongoing case management and connection to community resources.

The Lucky Duck Foundation is investing \$500,000 in philanthropic funds to make this program possible.

"Seniors Safe at Home" Announcement
September 29, 2023



APPENDIX E: CURRENT ALTERNATIVE REASONABLE COST LIMITS

SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

Project References								
PROPERTY NAME	BUILDING	TYPE	HCC (\$)	TDC (\$)	GROSS SF	\$/SF HCC	\$/SF TDC	BOARD REPORT
Elevator								
RANCHO BERNARDO TRANSIT VILLAGE	ELEVATOR	NEW	\$56,534,311	\$68,296,389	90,000	\$628.16	\$758.85	HCR22-118
CORTEZ HILL APARTMENTS	ELEVATOR	NEW	\$28,129,755	\$38,706,921	54,711	\$514.15	\$707.48	HCR23-017
MT ETNA FAMILY - MODICA	ELEVATOR	NEW	\$31,616,228	\$52,196,213	87,773	\$360.20	\$594.67	HCR23-036
CUATRO AT CITY HEIGHTS	ELEVATOR	NEW	\$52,338,491	\$78,037,266	132,958	\$393.65	\$586.93	HCR23-045
SKYLINE APARTMENTS	ELEVATOR	NEW	\$61,277,385	\$88,017,542	93,976	\$652.05	\$936.60	HCR23-094
THE IRIS	ELEVATOR	NEW	\$40,185,204	\$59,145,153	115,424	\$348.15	\$490.02	HCR23-095
HARRINGTON HEIGHTS	ELEVATOR	NEW	\$99,533,433	\$138,816,630	190,000	\$523.86	\$730.61	HCR23-096
8TH AVENUE FAMILY HOUSING	ELEVATOR	NEW	\$29,011,442	\$36,874,898	78,292	\$370.55	\$470.99	HCR23-119
Walkup								
SERENADE ON 43 RD	WALKUP	NEW	\$17,836,941	\$37,211,890	53,373	\$334.19	\$697.20	HCR23-056



SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

PROPOSED METHODOLOGY

AVERAGE TDC AND HCC		
	AVERAGE TDC PER Sq. Ft.	AVERAGE HCC PER Sq. Ft.
ELEVATOR	\$614.44	\$395.54
WALKUP	\$730.61	\$523.86

WALKUP COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
HCC: 523.86 TDC: 730.61	Walkup	107,653	188,393	148,848	260,484	188,982	330,718	247,176	432,559	307,975	538,955	346,772	606,850	385,035	673,812
SDHC	Walkup	261,930	365,307	366,702	511,430	471,474	657,552	628,632	876,737	785,790	1,095,921	890,562	1,242,044	995,334	1,388,166

ELEVATOR COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
HCC: 395.54 TDC: 614.44	Elevator	117,583	188,133	164,617	263,387	211,650	338,640	282,200	451,520	352,750	564,400	399,783	639,653	446,816	714,906
SDHC	Elevator	197,768	307,219	276,876	430,107	355,983	552,995	474,644	737,327	593,305	921,658	672,413	1,044,546	751,520	1,167,434

TDC/HCC TABLE: ACTIVITY #2021-1

PROPOSED SDHC REASONABLE COST LIMITS

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
Detached/Semi-Detached		136,343	238,601	176,741	309,297	211,000	369,250	251,321	439,813	296,325	518,568	324,990	568,732	351,888	615,804
Row Homes		115,702	202,479	153,383	268,420	188,093	329,153	235,032	411,306	283,362	495,884	312,598	547,047	339,871	594,775
Walkup		261,930	365,307	366,702	511,430	471,474	657,552	628,632	876,737	785,790	1,095,921	890,562	1,242,044	995,334	1,388,166
Elevator		197,768	307,219	276,876	430,107	355,983	552,995	474,644	737,327	593,305	921,658	672,413	1,044,546	751,520	1,167,434

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INTRODUCTION

AUTHORITIES FOR POLICIES IN ADMINISTRATIVE PLAN

Authority for the PHA policies is derived from many sources. Primary among these sources are federal regulations and guidance issued by HUD. State law also directs PHA policy. State law will be followed where such law exists and does not conflict with federal regulations. Industry practice may also be used to develop PHA policy as long as it does not conflict with federal requirements or prohibitions.

HUD

HUD provides the primary source of PHA policy through federal regulations, HUD notices, and handbooks. Compliance with federal regulations, current HUD notices, and current HUD handbooks is mandatory.

HUD also provides guidance to PHAs through other means such as HUD-published guidebooks, expired HUD notices, and expired handbooks. Basing PHA policy on HUD guidance is optional, as long as PHA policies comply with federal law, federal regulations and mandatory policy. Because HUD has already determined that the guidance it provides is consistent with mandatory policies, PHA reliance on HUD guidance provides the PHA with a “safe harbor.”

Material posted on the HUD website can provide further clarification of HUD policies. For example, FAQs on the HUD website can provide direction on the application of federal regulations in various aspects of the program.

State Law

Where there is no mandatory federal guidance, PHAs must comply with state law, if it exists. Where state law is more restrictive than federal law, but does not conflict with it, PHAs must follow the state law.

Industry Practice

Where no law or HUD authority exists on a particular subject, industry practice may support PHA policy. Industry practice refers to a way of doing things or a policy that has been adopted by a majority of PHAs.

HUD HCV Guidebook

In November 2019 HUD began issuing a new version of the HCV Guidebook chapter-by-chapter. Unlike the previous version of the HCV Guidebook in which chapters were numbered, the new version of the guidebook includes chapter names, but no numbers. As the new version of the guidebook has not yet been fully released, and since the previous version of the guidebook contains guidance not found in the new version, this Plan cites both versions of the guidebook. Therefore, where the HCV Guidebook is cited in the policy, the citation will make a distinction between the “old” and “new” versions of the guidebook. The “old” version of the guidebook will continue to be cited as HCV GB. If HUD has also released a new chapter on the same topic with information that either adds new information or updates existing information from the previous guidebook, the new guidebook will be cited as New HCV GB with a chapter title and page reference (example: New HCV GB, Payment Standards, p. 11).

Chapter 1 - OVERVIEW OF THE PROGRAM AND PLAN

INTRODUCTION

The Housing Authority of the County of San Diego (HACSD) receives its funding for the Housing Choice Voucher (HCV) program from the Department of Housing and Urban Development. HACSD is not a federal department or agency, but is a governmental or public body, created and authorized by state law to develop and operate housing and housing programs for low-income families. HACSD enters into an Annual Contributions Contract with HUD to administer the program requirements on behalf of HUD. HACSD must ensure compliance with federal laws, regulations and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation.

This chapter contains information about HACSD and its programs with emphasis on the HCV program. It also contains information about the purpose, intent and use of the plan and guide.

There are three parts to this chapter:

Part I: The Public Housing Agency (PHA). This part includes a description of the PHA, its jurisdiction, its programs, and its mission and intent.

Part II: The HCV Program. This part contains information about the Housing Choice Voucher program operation, roles and responsibilities, and partnerships.

Part III: The HCV Administrative Plan. This part discusses the purpose and organization of the plan and its revision requirements.

PART I: THE PHA

1-I.A. OVERVIEW

The Section 8 Program was enacted as part of the Housing and Community Development Act (Act) of 1974, which re-codified the U.S. Housing Act of 1937. The Act has been amended from time to time, and its requirements, as they apply to the Section 8 Tenant-Based Assistance Program, are described as implemented throughout this Administrative Plan. The Section 8 Rental Assistance Programs are federally funded and administered for the jurisdiction of the County of San Diego by the Housing Authority of the County of San Diego (HACSD). The current program that provides tenant-based assistance is the Housing Choice Voucher Program.

Administration of the Section 8 Program and the functions and responsibilities of the housing staff shall be in compliance with the County of San Diego personnel policy and the Department of Housing and Urban Development's (HUD) Section 8 regulations, as well as all federal, state, and local fair housing laws and regulations.

1-I.B. ORGANIZATION AND STRUCTURE OF THE PHA

The officials of HACSD are known as the Board of Commissioners, which are appointed in accordance with state housing law. The San Diego County Board of Supervisors and two tenant commissioners acts as the Board of Commissioners of HACSD for establishing policies under which HACSD conducts business, ensuring that policies are followed by HACSD staff and ensuring that HACSD is successful in its mission. The Board is responsible for preserving and expanding the agency's resources and assuring the agency's continued viability.

Formal actions of HACSD are taken through written resolutions, adopted by the Board of Commissioners and entered into the official records of the HACSD.

The principal staff member of the HACSD is the executive director (ED). The executive director is directly responsible for carrying out the policies established by the board and is delegated the responsibility for hiring, training and supervising HACSD staff in order to manage the day-to-day operations of the HACSD. The executive director is responsible for ensuring compliance with federal and state laws and directives for the programs managed. In addition, the executive director's duties include budgeting and financial planning for the agency.

The jurisdiction of the HACSD includes the cities of Chula Vista, Coronado, Del Mar, El Cajon, Escondido, Imperial Beach, La Mesa, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, Vista and the unincorporated county areas.

1-I.C. PHA MISSION:

The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of the agency. It provides guiding direction for developing strategy, defining critical success factors, searching out key opportunities, making resource allocation choices, satisfying clients and stakeholders, and making decisions.

The HACSD Mission Statement:

To provide affordable housing opportunities to low-income and other vulnerable families while promoting a region that is just, sustainable, and resilient.

HUD Mission Statement:

To create strong, sustainable, inclusive communities and quality affordable homes for all.

1-I.D. THE PHA'S PROGRAMS

The following programs are included under this administrative plan:

HACSD Policy

The HACSD's administrative plan is applicable to the operation of the Housing Choice Voucher program. In addition to the Housing Choice Voucher Rental Assistance Program, the HACSD operates the following housing assistance programs:

- Moderate Rehabilitation Program
- Emergency Housing Voucher (EHV) Program
- Mobile Home Demonstration Program
- Preservation/Enhanced Voucher Program
- Mainstream
- Bringing Families Home (BFH)
- Family Unification Program (FUP)
- Housing Opportunities for Persons with AIDS (HOPWA)
- HOME Tenant-Based Rental Assistance Programs
- Veterans Affairs Supportive Housing (VASH)

These programs are administered in conformance with Section 8 rules and regulations, unless indicated otherwise in the special program plans or the specific program regulations and guidelines published by HUD or other funding sources. The HACSD Administrative Plan policies and procedures constitute the policies and practices for these special housing assistance programs.

1-I.E. THE PHA'S COMMITMENT TO ETHICS AND SERVICE

As a public service agency, the PHA is committed to providing excellent service to HCV program participants, owners, and to the community. The PHA's standards include:

- Administer applicable federal and state laws and regulations to achieve high ratings in performance measurement indicators while maintaining efficiency in program operation to ensure fair and consistent treatment of clients served.
- Provide decent, safe, and sanitary housing, in compliance with program housing quality standards, for very low-income families while ensuring rents are fair, reasonable, and affordable.
- Encourage self-sufficiency of participant families and assist in the expansion of opportunities which address educational, socio-economic, recreational and other human services needs.
- Promote fair housing and the equal opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice.
- Promote a housing program which maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families.
- Promote a market-driven housing program that will help qualified low-income families be successful in obtaining affordable housing and increase the supply of housing choices.
- Create positive public awareness and expand the level of family, owner, and community support in accomplishing the PHA's mission.

Housing Authority of the County of San Diego

- Attain and maintain a high level of standards and professionalism in day-to-day management of all program components.
- Administer an efficient, high-performing agency through continuous improvement of the PHA's support systems and a high level of commitment to our employees and their development.
- The PHA will make every effort to keep program participants informed of HCV program rules and regulations, and to advise participants of how the program rules affect them.

HACSD Policy

Conflict of Interest

All officers or employees of the HACSD will comply with the Code of Ethics of the County of San Diego, COSD Health and Human Services Agency Code of Conduct, as well as all standards mandated under the Housing Choice Voucher Program. This includes compliance with the conflict-of-interest requirements of the Housing Choice Voucher Program under 24 CFR 982.161. The conflict-of-interest provision prohibits the Public Housing Agency (PHA), or any of its contractors or subcontractors, from entering any contract or arrangement in connection with the tenant-based programs in which any of the following classes or persons have any interest, direct or indirect, during tenure or for one year thereafter. The classes or persons include: (1) any present or former member or officer of the PHA (except a participant commissioner); (2) any employee of the PHA, or any contractor or subcontractor or agent of the PHA, who formulates policy or who influences decisions with respect to the programs; (3) any public official, member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs; and, (4) any member of the Congress of the United States. Any members of the classes described in this section must disclose their interest or prospective interest to the PHA and HUD. The HUD field office may waive for good cause the conflict-of-interest prohibition under this section.

All HACSD officers, employees, contractors, subcontractors, or agents will comply with all requirements that prohibit the solicitation or acceptance of gifts or gratuities, in excess of a nominal value.

All HACSD officers, employees, contractors, subcontractors, or agents will conduct business with integrity and in an honest and professional manner.

Any violations of code of ethics, core values and ethical standards policies will result in disciplinary action ranging from letter(s) of warning to termination of employment and/or contract. Opportunity may be offered, on a case-by-case basis, to correct a conflict of interest. Code of ethics, core values and ethical standards policies will be communicated to the above groups upon initial employment, prior to execution of a contract and at least annually.

PART II: THE HOUSING CHOICE VOUCHER (HCV) PROGRAM

1-II.A. OVERVIEW

The United States Housing Act of 1937 (the "Act") is responsible for the birth of federal housing program initiatives.

The Housing and Community Development Acts of 1974 and 1987 created the Section 8 tenant-based rental assistance programs, (Certificate and Voucher) operating as separate programs.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA) — also known as the Public Housing Reform Act — was signed into law. QHWRA eliminated all statutory differences between the former Certificate and Voucher tenant-based programs and required that the two programs be merged into a single tenant-based assistance program, now known as the Housing Choice Voucher (HCV) program.

The HCV program requires an assisted family to pay at least 30 percent of adjusted income for rent. Eligible families select housing in the private rental market. Eligible units must meet basic physical standard (housing quality standards) and rents must be within certain HUD-established rent limitations ("fair market rents").

1-II.B. HCV PROGRAM BASICS

The purpose of the HCV program is to provide rental assistance to eligible families. The rules and regulations of the HCV program are determined by the U.S. Department of Housing and Urban Development. HACSD is afforded choices in the operation of the program which are included in HACSD's administrative plan, a document approved by HACSD's Board of Commissioners.

The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the HACSD's jurisdiction and may also be eligible to move under portability to other PHAs' jurisdictions.

When a family is determined to be eligible for the program and funding is available, HACSD issues the family a housing voucher. When the family finds a suitable housing unit and funding is available, HACSD will enter into a contract with the owner and the family will enter into a lease with the owner. Each party makes their respective payment to the owner so that the owner receives full rent.

Even though the family is determined to be eligible for the program, the owner has the responsibility of approving the family as a suitable renter. HACSD will continue to make payments to the owner as long as the family is eligible, and the housing unit continues to qualify under the program.

Terminology

The Housing Authority of the County of San Diego is referred to as the "HACSD", "PHA" or "Housing Authority" throughout this document.

"Family" is used interchangeably with "Applicant" or "Participant" or "Tenant" or "Household" and can refer to a single person family.

"Tenant" is usually used to refer to participants in terms of their relation to landlords.

"Landlord" and "owner" are used interchangeably.

"Non-citizen Rule" refers to the regulation effective June 19, 1995, restricting assistance to U.S. citizens and eligible immigrants.

"HQS" means the Housing Quality Standards required by regulations as enhanced by the PHA.

"Failure to Provide" refers to all requirements of the Family Obligations of the program as outlined elsewhere in the Plan.

“Merger” date refers to October 1, 1999, which is the effective date of the merging of the Section 8 Certificate and Voucher programs into the Housing Choice Voucher Program.

See Glossary for other terminology.

1-II.C. THE HCV PARTNERSHIPS

To administer the HCV program, the PHA enters a contractual relationship with HUD (Consolidated Annual Contributions Contract). The PHA also enters into contractual relationships with the assisted family and the owner or landlord of the housing unit.

For the HCV program to work and be successful, all parties — HUD, the PHA, the owner, and the family — have important roles to play. The roles and responsibilities of all parties are defined in federal regulations and in legal documents that parties execute to participate in the program.

1-II.D. APPLICABLE REGULATIONS

Applicable regulations include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 35: Lead-Based Paint
- 24 CFR Part 100: The Fair Housing Act
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 983: Project-Based Vouchers
- 24 CFR 984: Family Self-Sufficiency Program
- 24 CFR Part 985: The Section 8 Management Assessment Program (SEMAP)

PART III: THE HCV ADMINISTRATIVE PLAN

1-III.A. OVERVIEW AND PURPOSE OF THE PLAN

The purpose of this Administrative Plan (Plan) is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives outlined in the PHA's agency plan. All pre-merger regular tenancy contracts, Housing Choice Voucher contracts and over fair market rent tenancy contracts have been transitioned to the Housing Choice Voucher Program as of October 1, 1999. This Plan is a supporting document to the PHA agency plan and is available for public review as required by CFR 24 Part 903.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the HUD programs it administers. If such changes conflict with this Plan, HUD regulations will have precedence. The PHA Board of Commissioners must approve the original Plan and any significant changes. The pertinent sections must be included in the agency plan with a copy provided to HUD.

Local rules incorporated in this Plan are intended to promote local housing objectives consistent with the intent of federal housing legislation.

HACSD Policy

Rules and Regulations [24 CFR 982.52]

This Plan defines the HACSD's local policies for operation of the housing programs in the context of federal laws and regulations. Generally, not fully addressed in this document are Section 8 issues governed by federal regulations, HUD memos, notices, guidelines, or other applicable law. If any issue is not found in this plan or in the resources named above, the HACSD may address the issue with a policy notice to HACSD staff and post on the HACSD website, unless the new policy is a significant program change as defined in the Agency Plan. The policies in this Plan have been designed to ensure compliance with the consolidated annual contributions contract (ACC) and all HUD-approved applications for program funding.

Temporary exceptions to the policies cited in this Plan may be authorized to mitigate jurisdiction-wide health and safety conditions or as directed or authorized by HUD. The HACSD may amend this Plan or may establish separate policy documents to comply with federal, state and local mandates.

1-III.B. CONTENTS OF THE PLAN [24 CFR 982.54]

The HUD regulations outline the policies that must be included in the administrative plan. The PHA's administrative plan must cover the PHA's policies as detailed in 24 CFR 982.54.

Mandatory vs. Discretionary Policy

HUD makes a distinction between:

- *Mandatory policies*: those driven by legislation, regulations, current handbooks, notices, and legal opinions,
- *Optional, non-binding guidance*: including guidebooks, notices that have expired and recommendations from individual HUD staff, and
- *Discretionary Policies*: those pertaining to matters for which HUD allows the PHA discretion to establish local policies.

1-III.C. ORGANIZATION OF THE PLAN

The plan is organized to provide information about particular areas of operation. Sections referencing PHA responsibilities generally reflect HUD mandated policy and sections referencing HACSD generally reflect discretionary policy.

1-III.D. UPDATING AND REVISING THE PLAN

The PHA will revise this administrative plan as needed to comply with changes in HUD regulations.

HACSD Policy

The HACSD will review and update the plan at least once per year, and more often if needed, to reflect changes in regulations, HACSD operations, or when needed to ensure staff consistency in operation.

Chapter 2- FAIR HOUSING AND EQUAL OPPORTUNITY

INTRODUCTION

This chapter explains the laws and HUD regulations requiring PHAs to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of the PHA's Housing Choice Voucher (HCV) operations.

This chapter describes HUD regulations and HACSD's policies related to these topics in three parts:

Part I: Nondiscrimination. This part presents the body of laws and regulations governing the responsibilities of HACSD regarding nondiscrimination.

Part II: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the Housing Choice Voucher program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of HACSD to ensure meaningful access to the HCV program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the Federal Register.

PART I: NONDISCRIMINATION

2-I.A. OVERVIEW

Federal laws require PHAs to treat all applicants and participants equally, providing the same opportunity to access services, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status.

The PHA will fully comply with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063 and 13988
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the Federal Register February 3, 2012, and further clarified in Notice PIH 2014-20
- Violence Against Women Reauthorization Act of 2013 (VAWA)

When more than one civil rights law applies to a situation, the laws will be read and applied together.

Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted will also apply.

HACSD Policy

The HACSD will not deny any family or individual the equal opportunity to apply for or receive assistance under the Section 8 programs on the basis of race, color, religion, creed, sex, national origin, handicap, familial status, age, ancestry, marital status, sexual orientation, source of income, medical condition, gender, gender identity, gender expression, genetic information or any other unlawful basis.

The PHA shall administer the program in compliance with the Violence Against Women Act (VAWA) and Department of Justice Reauthorization Act of 2013 (Pub. L. 109-162).

To further the HACSD commitment to full compliance with applicable civil rights laws, at the family briefing the HACSD will provide federal/state/local information regarding unlawful discrimination, and any recourse to those who believe they are victims of a discriminatory act. All applicable fair housing information and discrimination complaint forms will be included in the voucher holder's briefing packet and will be available upon request.

All HACSD staff members will be required to attend fair housing training. These employees, in the overall commitment to quality customer service, are informed of the importance of affirmatively furthering fair housing, providing equal opportunity to all families and providing reasonable accommodations to persons with disabilities. Fair housing posters may be displayed

throughout the Housing Authority office, including in the lobby, interview rooms, and in such a manner as to be readable from a wheelchair.

The equal opportunity logo will be used on all outreach materials. To keep current with new developments, staff will attend local fair housing annual update training sponsored by HUD or other organizations.

No individual with disabilities shall be denied the benefits, excluded from participation in programs, or otherwise be subjected to discrimination because the HACSD's facilities are inaccessible to or unusable by persons with disabilities. The HACSD's obligations regarding accessibility are subject to Title 24, Part 8, sections 8.21(c)(1), 8.24(a), 8.25, and 8.31 of the regulations.

The HACSD is accessible to persons with disabilities. The HACSD will utilize such services as necessary for telephonic communication with hearing impaired persons, such as the California Relay Service.

2-I.B. NONDISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as PHA policies, can prohibit discrimination based on other factors.

The PHA shall not discriminate because of race, color, sex, religion, familial status, age, disability or national origin.

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

The PHA will not discriminate on the basis of marital status, gender identity, sexual orientation, or any other state or federal protected class [FR Notice 02/03/12; Executive Order 13988].

HACSD Policy

HACSD does not identify any additional protected classes.

The PHA will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the housing choice voucher program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Subject anyone to sexual harassment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or participant toward or away from a particular area based any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class

- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class

Providing Information to Families and Owners

The PHA must take steps to ensure that families and owners are fully aware of all applicable civil rights laws. As part of the briefing process, HACSD will provide information to HCV applicant families about civil rights requirements and the opportunity to rent in a broad range of neighborhoods [24 CFR 982.301]. The Housing Assistance Payments (HAP) contract informs owners of the requirement not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the contract.

Discrimination Complaints (24 CFR 982.304)

Applicants or participants who believe that any family member has been discriminated against by the PHA or an owner, the family should advise the PHA.

The PHA should make every reasonable attempt to determine whether the applicant's or participant's assertions have merit and take any warranted corrective action. In addition, HACSD will provide the applicant or participant with information about how to file a discrimination complaint.

Upon receipt of a housing discrimination complaint, PHA will:

- Provide written notice of the complaint to those alleged and inform the complainant that such notice was made
- Investigate the allegations and provide the complainant and those alleged with findings and either a proposed corrective action or an explanation of why corrective action is not warranted
- Keep records of all complaints, investigations, notices, and corrective actions [Notice PIH 2014-20]

HACSD Policy

Applicants or participants who believe that they have been subject to unlawful discrimination by PHA staff may notify the HACSD either orally or in writing.

The PHA will attempt to remedy discrimination complaints made against the PHA and will conduct an investigation into all allegations of discrimination.

Applicants or participants who believe that they have been subject to unlawful discrimination by Owners may notify the HACSD or local fair housing provider. For complaints received by the HACSD, the HACSD will provide information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

The PHA will keep a record of all complaints, investigations, notices, and corrective actions.

PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES

2-II.A. OVERVIEW

[24 CFR 8.4(b)(i), 8.24 and 8.33; Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

The PHA must ensure that persons with disabilities have full access to the PHA's programs and services. This responsibility begins with the first contact by an interested family and continues through every aspect of the program.

HACSD Policy

HACSD will ask all applicants and participants if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by HACSD, by including the following language:

"If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority."

A specific name and phone number of designated staff will be provided to process requests for accommodation.

The HACSD will display posters and other housing information and signage in locations throughout the HACSD's office in such a manner as to be easily readable from a wheelchair.

2-II.B. DEFINITION OF REASONABLE ACCOMMODATION

A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces.

When a family member requires an accessible feature(s) or change, exception or adjustment to a rule, policy, practice, or service to accommodate a disability, PHAs must provide such feature(s) or modification(s) unless doing so would result in a fundamental alteration in the nature of the program, or an undue financial and administrative burden. In such instance, the HACSD will engage in an interactive process with the family member with the goal of finding a reasonable alternative accommodation that would meet the family member's disability-related needs. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

The HACSD's policies and practices are designed to, upon request, provide reasonable accommodations to persons with disabilities, so they may fully access and utilize the housing program and related services. The availability of reasonable accommodation is made known by including the information on the Housing Authority's forms and letters. This policy will afford persons with disabilities an equal opportunity to obtain the same result, gain the same benefit or reach the same level of achievement as those who do not have disabilities. This policy is applicable to all situations described in this Plan, including when a family initiates contact with the HACSD or when the HACSD initiates contact with a family. This policy is applicable when a family applies for assistance, as well as when the HACSD schedules or reschedules appointments of any kind.

Types of Reasonable Accommodations

When needed, the PHA will modify normal procedures to accommodate the needs of a person with disabilities. Examples include:

- Permitting applications and reexaminations to be completed by mail
- Conducting home visits
- Using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside the PHA's range) if the PHA determines this is necessary to enable a person with disabilities to obtain a suitable housing unit
- Providing time extensions for locating a unit when necessary, because of lack of availability of accessible units or special challenges of the family in seeking a unit
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff

2-II.C. REQUEST FOR AN ACCOMMODATION

If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that the PHA treat the information as a request for a reasonable accommodation, even if no formal request is made.

The family must explain what type of accommodation is needed to provide the person with the disability full access to the PHA's programs and services.

If the need for the accommodation is not readily apparent or known to the PHA, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable connection, or nexus, between the requested accommodation and the individual's disability.

HACSD Policy

A participant with a disability must ask for a specific change to a policy or practice as an accommodation of their disability before the HACSD will have an obligation to consider any accommodation. The HACSD will encourage the participant to make the request in writing; however, the HACSD will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

In making the request, the individual should explain what type of accommodation he or she is requesting and, if the need for the accommodation is not readily apparent or not known to the HACSD, explain the relationship between the requested accommodation and their disability. A person with a disability need not personally make the reasonable accommodation request; a family member or someone else who is acting on their behalf may make the request. An individual making a reasonable accommodation request does not need to use the words "reasonable accommodation." However, the requester must make the request in a manner that a reasonable person would understand it to be a request for an exception, change or adjustment to a rule, policy, practice, or service because of a disability.

2-II.D. VERIFICATION OF DISABILITY

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability which is used for waiting list preferences and income allowances.

Before providing an accommodation, the PHA must determine that the person meets the definition of a person with a disability and that the accommodation will enhance the participant's access to the PHA's programs and services.

If a participant's disability is obvious or otherwise known to the PHA, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a participant indicates that an accommodation is required for a disability that is not obvious or otherwise known to the PHA, the PHA must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, the PHA will follow the verification policies provided in Chapter 7. All information related to a person's disability will be treated in accordance with the confidentiality policies provided in Chapter 16. In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

- Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].
- The PHA must request only information that is necessary to evaluate the disability-related need for the accommodation. The PHA will not inquire about the nature or extent of any disability.
- Depending on the individual's circumstances, information verifying that the person requesting the accommodation meets the definition of a disabled person can usually be provided by the individual himself or herself (e.g., proof that an individual under 65 years of age receives Supplemental Security Income or Social Security Disability Insurance benefits or a credible statement by the individual).
- The PHA may only request information that is necessary to evaluate the disability-related need for the accommodation. The PHA will not inquire about the nature or extent of any disability.
- Medical records will not be accepted or retained in the participant file.
- In the event that the PHA does receive confidential information about a person's specific diagnosis, treatment or the nature or severity of the disability, the PHA will destroy it. In place of the information, the PHA will note in the file that the disability and other requested information have been verified, the date the verification was received and the name and address of the knowledgeable professional who sent the information. [Notice PIH 2010-26]

2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION

[Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act, Notice PIH 2010-26].

The PHA must approve a request for an accommodation if the following three conditions are met:

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on the PHA or fundamentally alter the nature of the PHA's operations (including the obligation to comply with HUD requirements and regulations).

The determination of undue financial and administrative burden will be made on a case-by-case basis and will take into consideration various factors, such as the cost of the requested accommodation, the financial resources of the provider, the benefits that the accommodation would provide to the requester and the availability of alternative accommodations that would effectively meet the requester's disability-related needs.

HACSD Policy

After a request for an accommodation is presented, the HACSD will provide a written decision to the person requesting the accommodation within a reasonable time.

Before deciding whether to approve the request, HACSD will attempt to enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form allowing HACSD to verify the need for the requested accommodation.

If a determination cannot be completed due to documentation, HACSD will assist the family to understand the documentation required which satisfies a preponderance of evidence prior to denying the request.

If HACSD denies a request for an accommodation because it has determined there is no relationship, or nexus, found between the disability and the requested accommodation, HACSD will provide written notification of the decision. An additional internal review may be conducted if the family disagrees with the decision and requests a review of the methodology or documentation used in the determination.

If HACSD denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of HACSD's operations), HACSD will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.

If HACSD and the family are unable to identify a reasonable alternative accommodation after interactive discussion and negotiation, HACSD will notify the family in writing of its determination after the date of the most recent discussion or communication with the family.

Reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices. In addition, a designee may represent the individual with a disability, but only with written permission of the disabled person.

Verification

HACSD will request the verifying party to state whether the accommodation will be needed on a permanent or temporary basis.

If a reasonable accommodation is approved on a temporary basis, the HACSD will require an annual recertification to verify that the person meets the definition of a person with a disability and that the limitations imposed by the disability continue to require the requested accommodation. If a reasonable accommodation is approved on a permanent basis, an annual recertification of the disability will not be required. A required annual recertification of the disability will be conducted in conjunction with the regularly scheduled annual reexamination of income and family composition in accordance with the policies set forth in Chapter 11.

Requests for an extra bedroom for a live-in aide must be supported by verification from a health care provider that documents the medical need for the live-in aide.

Requests for an extra bedroom for medical equipment must be supported by verification from a health care provider that documents the need for the extra bedroom. The actual equipment

in the extra bedroom should be verified by the HACSD during routinely scheduled inspections of the unit. If the extra bedroom is not being used for the intended purpose, the HACSD must reduce the subsidy standard and corresponding payment standard at the family's next annual recertification. The HACSD may take further action, if it believes that any family obligations under 24 CFR Section 982.551 were violated.

2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS

HUD regulations require the PHA to ensure that persons with disabilities related to hearing and vision have reasonable access to the PHA's programs and services [24 CFR 8.6].

At the initial point of contact with each applicant, the PHA shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

HACSD Policy

To meet the needs of persons with hearing impairments, the PHA will make appropriate accommodations available upon request.

To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request, utilizing available technology as agreed upon by individuals requesting the accommodation. When visual aids are used in public meetings or presentations, or in meetings with HACSD staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation; having material explained orally by staff; or having a third-party representative (a friend, relative or advocate, named by the applicant) to receive, interpret and explain housing materials and be present at all meetings.

2-II.G. PHYSICAL ACCESSIBILITY

The PHA must comply with a variety of regulations pertaining to physical accessibility. This plan describes the key policies that govern the PHA's responsibilities with regard to physical accessibility.

- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to nondiscrimination and accessibility in federally funded housing programs.

The design, construction, or alteration of PHA facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the HCV program.

When issuing a voucher to a family that includes an individual with disabilities, the PHA will include a current list of available accessible units known to the PHA and will assist the family in locating an available accessible unit, if necessary.

In general, owners must permit the family to make reasonable modifications to the unit. However, the owner is not required to pay for the modification and may require that the unit be restored to its original state at the family's expense when the family moves.

2-II.H. DENIAL OR TERMINATION OF ASSISTANCE

A PHA's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 982.552 (2)(iv)].

When applicants with disabilities are denied assistance, the notice of denial must inform them of the PHA's informal review process and their right to request an informal review. In addition, the notice must inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal review process.

When a participant family's assistance is terminated, the notice of termination must inform them of the PHA's informal hearing process and their right to request a hearing and reasonable accommodation.

When reviewing reasonable accommodation requests, the PHA must consider whether any mitigating circumstances can be verified to explain and overcome the problem that led to the PHA's decision to deny or terminate assistance. If a reasonable accommodation will allow the family to meet the requirements, the PHA must make the accommodation.

PART III: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

2-III.A. OVERVIEW

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding, and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the HCV program. This part incorporates the Final Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007, in the Federal Register.

The PHA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency (LEP).

LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. For the purposes of this administrative plan, LEP persons are HCV applicants and participants, and parents and family members of applicants and participants.

In order to determine the level of meaningful access needed by LEP persons, HACSD will balance the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Housing Choice Voucher program; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the PHA and costs. Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on the PHA.

The HACSD conducted a 2020 LEP analysis of its program that indicates the "number or proportion" of its LEP participants to be 26.7% or 2799 persons (or households) for all LEP language groups. Further review found the language groups of Spanish and Arabic to be above the "threshold" of 5%, and/or above 1,000 persons for each group. Other non-English language groups fall below 1000 persons and below 5% of all households. Current year demographic data remains consistent with these threshold language groups for applicants and participants. The HACSD has moderate frequency of contact with LEP clients regarding its programs. The "nature" of the Section 8 program in providing housing assistance to the needy is "important" enough to have "serious or even life-threatening implications for the LEP individual," which is the very reason the HACSD monitors any "denial or delay of access" to its program and provides language services when requested. The HACSD provides appropriate assistance to its clients at a reasonable expense due to the recruitment of multi-lingual staff and availability of outside resources to provide a mixture of LEP services for interpretation and translation.

The HACSD will continue to develop and implement a more accurate system of tracking "proportion" of LEP to the general population on the program, to better anticipate the need of any growing LEP language group. HACSD continues to systematically collect the primary languages of applicants and participants. Responses received as of the date of this Plan demonstrate results consistent with the 2020 analysis for the number of households that meet or exceed threshold recommendations. LEP active program participants were found to be above the 5% "threshold" and 1,000 persons for the Spanish and Arabic language groups. Additionally, available applicant language declaration also places Spanish and Arabic above both thresholds. The HACSD will continue to analyze the results periodically to determine if any updates to this section are warranted. Staff are trained to be aware of all potential LEP issues.

In determining whether it is feasible to provide translation of documents written in English into other languages, the HACSD will consider the following factors:

- The availability of local organizations to provide translation services to non-English speaking

families

- The availability of bilingual staff to provide translation for non-English speaking families

2-III.B. ORAL INTERPRETATION

HACSD will offer competent interpretation services free of charge, upon request, to the LEP person.

HACSD Policy

HACSD will utilize a language line for telephone interpreter services. Staff may utilize the United Language Group by calling 1-888-362-0614 for oral interpretation over the phone.

When exercising the option to conduct remote briefings, informal reviews, or hearings, however, HACSD may use video conferencing technology rather than voice-only interpretation.

Interpreters may also be requested for in-person appointments.

Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by HACSD. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely on the minor to serve as the interpreter. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing.

HACSD will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits.

2-III.C. WRITTEN TRANSLATION

HACSD Policy

HACSD will provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or

If there are fewer than 50 persons in a language group that reaches the 5 percent trigger, HACSD does not translate vital written materials, but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Based on the language analysis and federal guidelines, HACSD has determined that core vital documents should be made available in English, Spanish and Arabic and other language groups may request an oral interpretation of notices and documents as needed. Vital documents will include consent and compliance forms, application and recertification forms, written notice of rights/handbooks, notices of denials/terminations/reduction of benefits, public notices advising LEP individuals of free access to language assistance services.

Public Notices

Public notices will also be made available in the region's threshold languages according to County of San Diego Policy A-139.

EXHIBIT 2-1: DEFINITION OF A PERSON WITH A DISABILITY UNDER FEDERAL CIVIL RIGHTS LAWS [24 CFR Parts 8.3 and 100.201]

A person with a disability, as defined under federal civil rights laws, is any person who:

- Has a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or
- Has a record of such impairment, or
- Is regarded as having such impairment

The phrase “physical or mental impairment” includes:

- Any physiological disorder or condition, cosmetic or disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes but is not limited to: such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

“Major life activities” includes, but is not limited to, caring for oneself, performing manual tasks, walking, seeing, hearing, breathing, learning, and/or working.

“Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

“Is regarded as having an impairment” is defined as having a physical or mental impairment that does not substantially limit one or more major life activities but is treated by a public entity (such as the PHA) as constituting such a limitation; has none of the impairments defined in this section but is treated by a public entity as having such an impairment; or has a physical or mental impairment that substantially limits one or more major life activities, only as a result of the attitudes of others toward that impairment.

The definition of a person with disabilities does not include:

- Current illegal drug users
- People whose alcohol use interferes with the rights of others
- Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the HCV program

The above definition of disability determines whether an applicant or participant is entitled to any of the protections of federal disability civil rights laws. Thus, a person who does not meet this disability is not entitled to a reasonable accommodation under federal civil rights and fair housing laws and regulations.

The HUD definition of a person with a disability is much narrower than the civil rights definition of disability. The HUD definition of a person with a disability is used for purposes of receiving the disabled family preference, the \$400 elderly/disabled household deduction, the \$480 dependent deduction, the allowance for medical expenses, or the allowance for disability assistance expenses.

Housing Authority of the County of San Diego

The definition of a person with a disability for purposes of granting a reasonable accommodation request is much broader than the HUD definition of disability. Many people will not qualify as a disabled person under the HCV program, yet an accommodation is needed to provide equal opportunity.

Chapter 3- ELIGIBILITY

INTRODUCTION

The PHA is responsible for ensuring that every individual and family admitted to the HCV program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the PHA to confirm eligibility and determine the level of the family's assistance.

To be eligible for the HCV program:

- The applicant family must:
 - Qualify as a family as defined by HUD and the PHA.
 - Have income at or below HUD-specified income limits.
 - Qualify on the basis of citizenship or the eligible immigrant status of family members.
 - Provide social security number information for household members as required.
 - Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.
 - Not currently be receiving a duplicative subsidy.
- The PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

This chapter contains three parts:

Part I: Definitions of Family and Household Members. This part contains HUD and PHA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.

Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.

Part III: Denial of Assistance. This part covers factors related to an applicant's past or current conduct (e.g. criminal activity) that can cause HACSD to deny assistance.

PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS

3-I.A. OVERVIEW

Some eligibility criteria and program rules vary depending upon the composition of the family requesting assistance. In addition, some requirements apply to the family as a whole and others apply to individual persons who will live in the assisted unit. This part provides information that is needed to correctly identify family and household members, and to apply HUD's eligibility rules.

Marital status could affect the determination of total or adjusted income. For example, a working person under age 18 designated the spouse of the head of household would not have exempt wage income, or if a non-elderly or non-disabled head of household has an elderly or disabled spouse, that family would be designated an elderly or disabled household.

3-I.B. FAMILY AND HOUSEHOLD

[24 CFR 982.201(c); FR Notice 02/03/12; Notice PIH 2014-20]

The terms family and household have different meanings in the HCV program.

Family

To be eligible for assistance, an applicant must qualify as a family. *Family* as defined by HUD include, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together. Such group includes but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual Orientation means homosexuality, heterosexuality, or bisexuality.

HACSD Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.

The HACSD will include a registered domestic partnership, as recognized by state law, in the definition and all references to marriage outlined in this Plan.

Each family must identify the individuals to be included in the family at the time of application and must notify HACSD if the family's composition changes.

Household

Household is a broader term that includes additional people who, with PHA permission, live in an assisted unit, such as live-in aides, foster children and foster adults.

3-I.C. FAMILY BREAKUP AND REMAINING MEMBER OF TENANT FAMILY

Family Breakup [24 CFR 982.315; Notice PIH 2017-08]

Except under the following conditions, the PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up:

- If the family breakup results from an occurrence of domestic violence, dating violence, sexual assault, or stalking, the PHA must ensure that the victim retains assistance. (For documentation requirements and policies related to domestic violence, dating violence, sexual assault, and stalking, see section 16-IX.D of this plan.)
- In accordance with Notice PIH 2017-08, for HUD–Veterans Affairs Supportive Housing (HUD–VASH) vouchers, when the veteran is the perpetrator of domestic violence, dating violence, sexual assault, or stalking, the victim must continue to be assisted. Upon termination of the perpetrator’s HUD–VASH voucher, the victim should be given a regular HCV if one is available, and the perpetrator’s HUD–VASH voucher should be used to serve another eligible family. If a regular HCV is not available, the victim will continue to use the HUD–VASH voucher, which must be issued to another eligible family upon the voucher’s turnover.
- If a court determines the disposition of property between members of the assisted family, the PHA is bound by the court’s determination of which family members continue to receive assistance.

HACSD Policy

When an assisted family or a family who has been issued a voucher divides into two otherwise eligible families, and cannot agree as to which new family unit should retain the assistance and/or the voucher, and there is no determination by a court; the HACSD, in determining which family will receive the voucher, will consider the following factors in ranking order of importance, with one representing the greatest importance and six the least importance:

1. If the family breakup results from an occurrence of domestic violence, dating violence, sexual assault, or stalking, the PHA must ensure that the victim retains assistance.
2. Which of the two new family units has legal custody/guardianship of the dependent children.
3. The composition of the new family units, and which unit contains elderly or disabled members.
4. Recommendations of social service professionals.
5. Which family member was the head of household when the voucher was initially issued, as indicated on the initial application.
6. Which family members are remaining in the assisted unit.

Documentation of these factors will be the responsibility of the requesting parties.

The decision on who will be assigned the voucher will be issued in writing to both parties within 30 days of the request for assignment. The party not assigned the voucher may request an administrative review of the decision within 14 days of the date of the notice. The decision will be reviewed by a Housing Specialist II (or above) who was not a party to the original decision.

Remaining Member of a Tenant Family [24 CFR 5.403]

The HUD definition of family includes the remaining member of a tenant family, which is a member of an assisted family who remains in the unit when other members of the family have left the unit. Household members such as live-in aides, foster children, and foster adults do not qualify as remaining members of a family.

If dependents are the only “remaining members of a tenant family” and there is no family member able to assume the responsibilities of the head of household, see Chapter 6, Section 6- I.B, for the policy on “Caretakers for a Child.”

HACSD Policy

Authorized family members are eligible for remaining member status and the family’s voucher.

In order for a minor child to continue to receive assistance as a remaining family member, HACSD must receive one of the following:

Documentation that a court has awarded emancipated minor status to the minor; or

The HACSD has verified that social services and/or the juvenile court has arranged for another adult to be brought into the assisted unit to care for the child for an indefinite period.

A reduction in family size may require a reduction in the voucher size.

3-I.D. HEAD OF HOUSEHOLD [24 CFR 5.504(b)]

Head of household means the adult member of the family who is considered the head for purposes of determining income eligibility and rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a cohead or spouse.

HACSD Policy

The head of household is the adult member of the household designated by the family as the person wholly or partly responsible for paying the rent and with the legal capacity to enter into a lease under state/local law. Emancipated minors who qualify under state law may be recognized as head of household.

3-I.E. SPOUSE, COHEAD, AND OTHER ADULT

A family may have a spouse or co-head, but not both [HUD-50058 IB, p. 13].

Spouse means the marriage partner of the head of household.

HACSD Policy

Spouse also includes a registered domestic partner, as defined by state law.

For proper application of the non-citizen rule, the definition of spouse is the marriage partner from whom, in order to dissolve the relationship, an individual must be legally divorced. In addition, the partner in a common law marriage, as defined under state law, is also considered a "spouse." The term "spouse" does not apply to boyfriends, girlfriends, significant others, or co-heads.

A *co-head* is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program, but is not a spouse. A family can have only one cohead. A co-head never qualifies as a dependent.

HACSD Policy

A co-head is designated only upon admission to the program or admission to the household. An adult household member identified by the family on the eligibility booklet as the significant other of the head of household will be designated the co-head. A significant other is a household member who is identified as the "boyfriend," "girlfriend," "fiancée," or by other similar terms that indicate the person's significant relationship to the head of household. At the time of admission to the program/household, the family may request that another adult family member be designated co-head. Once a family member is designated co-head that designation does not change unless someone is subsequently designated a spouse, the co-head moves out of the household, or the co-head becomes the head of household. A minor who is emancipated under state law may be designated a co-head.

In the application of subsidy standards and calculation of benefits, a co-head is handled the same as a spouse. For example, a family with an elderly co-head or a co-head with a disability

is considered a "disabled/elderly family" and is entitled to all "elderly/disabled family" deductions and allowances.

Other adult means a family member, other than the head, spouse, or cohead, who is 18 years of age or older. Foster adults and live-in aides are not considered other adults.

HACSD Policy

The admission of *other adults* to the household is restricted. See exhibit 11-1.

3-I.F. DEPENDENT [24 CFR 5.603]

A *dependent* is a family member who is under 18 years of age or a person of any age who is a person with a disability or a full-time student, except that the following persons can never be dependents: the head of household, spouse, cohead, foster children/adults and live-in aides.

Identifying each dependent in the family is important because each dependent qualifies the family for a dependent allowance as described in Chapter 6.

Joint Custody of Dependents

HACSD Policy

Children, who are subject to a joint custody agreement but live with the applicant/participant more than 50 percent of the time, will be considered members of the household. More than 50 percent of the time is 183 or more cumulative days during the year.

In cases where separated parents are trying to claim the child as a member of the household, the parent whose address is listed in the school records will be allowed to claim the school-age child as a dependent.

In a joint custody arrangement, if the minor is in the household less than six months per year, the minor will be considered to be an eligible visitor and not a family member.

3-I.G. FULL-TIME STUDENT [24 CFR 5.603; HCV GB]

A *full-time student* (FTS) is a person who is attending school or vocational training on a full-time basis. The time commitment or subject load that is needed to be full-time is defined by the educational institution.

Identifying each FTS is important because: (1) each family member that is an FTS, other than the head, spouse, or cohead, qualifies the family for a dependent allowance, and (2) the earned income of such an FTS is treated differently from the income of other family members.

**3-I.H. ELDERLY AND NEAR-ELDERLY PERSONS, AND ELDERLY FAMILY
[24 CFR 5.100 and 5.403, FR Notice 02/03/12]**

Elderly Persons

An *elderly person* is a person who is at least 62 years of age.

Near-Elderly Persons

A *near-elderly person* is a person who is at least 50 years of age but below the age of 62.

Elderly Family

An *elderly family* is one in which the head, spouse, cohead, or sole member is an elderly person. Identifying elderly families is important because elderly families qualify for the elderly family allowance as described in Chapter 6.

3-I.I. PERSONS WITH DISABILITIES AND DISABLED FAMILY [24 CFR 5.403, FR Notice 02/03/12]

Persons with Disabilities

Under the HCV program, special rules apply to persons with disabilities and to any family whose head, spouse, or cohead is a person with disabilities. The technical definitions of individual with handicaps and persons with disabilities are provided in Exhibit 3-1 at the end of this chapter.

These definitions are used for a number of purposes including ensuring that persons with disabilities are not discriminated against based upon disability.

As discussed in Chapter 2, the PHA will make all aspects of the HCV program accessible to persons with disabilities and consider reasonable accommodations requested based upon a person's disability.

Disabled Family

A *disabled family* is one in which the head, spouse, or cohead is a person with disabilities. Identifying disabled families is important because these families qualify for the disabled family allowance as described in Chapter 6.

Even though persons with drug or alcohol dependencies are considered persons with disabilities, this does not prevent the PHA from denying assistance for reasons related to and drug abuse in accordance with the policies found in Part III of this chapter, or from terminating assistance in accordance with the policies in Chapter 12. See Exhibit 3-1 for detailed definitions related to disabilities.

3-I.J. GUESTS [24 CFR 5.100]

A *guest* is a person temporarily staying in the unit with the consent of a member of the household who has expressed or implied authority to so consent.

HACSD Policy

A guest, except as noted below, who is in the unit more than 14 consecutive days without HACSD approval, or a total of 30 days in a 12-month period, will be considered to be living in the unit as an unauthorized household member. The family may request an exception to this guest policy for disability-related reasons, providing the family submits documentation of disability and disability-related need (unless apparent) and the guest's permanent residence.

Use of the unit address as the guest's current residence for any purpose that is not explicitly temporary shall be construed as permanent residence.

Absence of evidence of any other permanent address will be considered evidence that the guest is a member of the household.

The burden of proof that the individual is a guest rests on the family. In the absence of such proof, the individual will be considered an unauthorized member of the household, and the HACSD will terminate assistance.

The limitation on guests is not applicable to minors and college students who were once part of the household, children under a joint custody agreement, and adult caretakers, not included on the HUD 50058. Minors and college students who were part of the family, but who now live away from home during the school year and are no longer on the lease, may visit, with the owner's and the HACSD's permission, for up to 120 days per year without being considered a member of the household. An adult caretaker may remain in the unit as a guest for up to 180 days.

The HACSD may have entered into an agreement with the family to remove a person from the assisted household in lieu of denial or termination of program participation. In such case, the agreement may require that the excluded person not visit the household. Therefore, if it is found

that said person has visited the household in violation of the agreement, the family is subject to termination of program participation per the provisions of the agreement.

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609].

The term *foster child* is not specifically defined by the regulations.

Foster children and foster adults who are living with an applicant or who have been approved by the PHA to live with a participant family are considered household members but not family members. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].

HACSD Policy

A *foster child* is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in a violation of HQS space standards according to 24 CFR 982.401.

Documentation must be submitted to verify the identity of the foster children/adults, to confirm they are foster children/adults, to confirm the foster children/adults are legal U.S. residents and the benefits are paid on behalf of the foster children/adults.

Foster children/adults are not subject to non-citizen rule requirements, but the placement agency must confirm they are legal U.S. residents

A streamlined documentation process is acceptable for foster children/adults expected to be in the household for a short period of time. Foster children/adults expected to be in the household at least one year are considered a part of the family in determining the subsidy standards and income limits.

The criminal history of adult foster children must be verified prior to admission to the household and whenever the criminal history of adult family members is reviewed. Adult foster children must sign release of information forms so that criminal history can be verified.

Foster children/adults may not be considered remaining members of the tenant family.

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons including educational activities, placement in foster care, employment, illness, incarceration, and court order.

Definitions of Temporarily and Permanently Absent

HACSD Policy

Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. An individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is generally considered permanently absent and no longer a family member. Exceptions to this general policy are discussed in this section.

Absence of Sole Member

A sole member is considered permanently absent if absent from the unit for 30 consecutive days. A sole member may be granted an extension of up to 180 consecutive days for medical reasons, as a reasonable accommodation for a disability, or a family emergency.

Court-Ordered Absence

When a court order restricts someone, who has been considered a family member from living in the home, the PHA must determine whether the member is temporarily or permanently absent. This policy applies to circumstances such as temporary restraining orders, but not jail or prison incarceration, which are covered separately. If the court order permanently restricts the return of the absent family member for more than 180 days, that family member will be considered permanently absent.

There must also be a review for prohibited activities, such as domestic violence, that may disqualify the family or the absent family member from program participation.

Absence Due to Incarceration

If a household member is incarcerated for more than 180 consecutive days, s/he will be considered permanently absent.

The HACSD will request documentation necessary to determine if the reason for incarceration is for prohibited activities and take the appropriate action.

Absence of Entire Family [24 CFR 982.312]

HUD regulations require the HACSD to terminate assistance when the entire family is absent from the unit for a period of more than 180 consecutive calendar days.

"Absence" means that no family member is residing in the unit.

Families are required to notify the HACSD before they move or are absent for more than 30 consecutive days from a unit.

If the entire family is absent from the assisted unit for more than 30 consecutive days, the unit will be considered vacated, and the assistance for the unit and family will be terminated. However, the HACSD may grant an extension for absences of up to 180 consecutive days for a family emergency or medical reason.

Absent Students

Full-time students who attend school away from the home will be treated in the following manner:

A student (other than head of household, spouse or co-head) who attends school away from home, but lives with the family during school recesses may, depending on the circumstances, be considered either temporarily or permanently absent. If the family member is considered permanently absent, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of voucher size.

Students who are out of the home more than 50 percent of the year are considered permanently absent, unless they are in boarding school, school dormitories, or temporarily staying with family or friends without a lease or rental agreement.

Absences Due to Placement in Foster Care [24 CFR 5.403]

Children temporarily absent from the home as a result of placement in foster care are considered members of the family.

HACSD Policy

The HACSD will verify with the appropriate agency when a child or children, temporarily absent from the home due to placement in foster care will return. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

If the children have been removed permanently, the voucher size will be reviewed and reduced, if appropriate.

Absent Head, Spouse, or Cohead

HACSD Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Absence Due to Military Service

In cases where a military member is a single head of household with minor children and the family moves out of the assisted unit due to a verifiable overseas military deployment of the head of household, the HACSD will allow the family to resume participation in the rental assistance program when the head of household returns from deployment if the deployment is 24 months or less.

Absence of Parents and Assignment of Caretaker for Children

When the courts or a social service agency have determined that another adult is to be brought into the assisted unit to care for the children for an indefinite period, in instances when the parents have vacated, the HACSD will treat that adult as a visitor for the first 180 days. During the time the caretaker is considered a visitor, the caretaker's income will not be counted, or deductions allowed.

After 180 days, if the court awards custody or legal guardianship to the caretaker, the voucher will be transferred to the caretaker, providing the caretaker meets all eligibility criteria for household additions. If there is court action to award custody or legal guardianship in process, the caretaker will be approved to continue in the unit as a visitor beyond 180 days.

The HACSD will transfer the voucher to the caretaker, in the absence of a court order, if the caretaker has been in the unit for more than 12 months, and it is reasonable to expect custody to be granted.

If custody is awarded for a limited time, the HACSD will state in writing that the transfer of the voucher is for a limited time, and as long as the caretaker has the custody of the children.

Once the caretaker is approved by the HACSD and no longer considered a visitor, the income of the caretaker will be counted, and deductions will be allowed.

Family Members Permanently Confined for Medical Reasons [HCV GB]

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB].

HACSD Policy

An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If a family member leaves the household to enter a facility such as a hospital, nursing home, or rehabilitation center, the HACSD will require verification from a reliable, qualified source as to the likelihood of their return, and the anticipated length of their absence.

Sole Family Member

If the verification indicates the sole family member is permanently confined to a nursing home, s/he will be considered permanently absent, and assistance will be terminated. If the verification indicates the sole family member may return in less than 180 consecutive days or is unsure when the sole family member will return, the family member may be considered temporarily absent.

Remaining Household Member

If a family member is confined to a hospital or nursing home for an indefinite duration, and there is a family member left in the household, the HACSD will calculate the lower family rent by comparing the following methods:

- Exclude the income of the person confined to the nursing home, give the family no deductions for the medical expenses of the confined family member, and review and reduce the family's voucher size, if appropriate; or
- Include the income of the person confined to the nursing home and give the family the medical deductions allowable on behalf of the person in the nursing home.

Return of Permanently Absent Family Members

HACSD Policy

The family must request HACSD approval for the return of any adult family members that the HACSD previously determined to be permanently absent. The individual is subject to the eligibility and screening requirements discussed elsewhere in this chapter.

3-I.M. LIVE-IN AIDE

A *live-in aide* is a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined by the HACSD to be essential to the care and well-being of the persons, (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].

The PHA must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by the family member with disabilities. A knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member must verify the medical need for the live-in aide [PIH 2010-51; PIH 2012-33].

The income of a live-in aide is not counted in the calculation of annual income for the family [24 CFR 5.609(b)]. Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. Because live-in aides are not family members, a relative who serves as a live-in aide would not be considered a remaining member of a tenant family.

A family may include a live-in aide provided that such live-in aide:

- Was not a member of the assisted household as a family member for at least one year prior to being admitted as a live-in aide; and
- Will not overcrowd the unit (although the family is entitled to transfer to a larger unit to prevent over-crowding and the live-in aide is entitled to a separate bedroom).

HACSD Policy

The family members of a live-in aide may reside in the unit with approval of the HACSD. However, the HACSD reserves the right to rescind the approval or disapprove the addition of

family members of a live-in aide if it is determined that they may negatively impact the assisted household, or because they are not the dependents or the spouse of the live-in aide.

A participating family has 30 days from the date a live-in aide vacates the unit to obtain another eligible live-in aide. After 30 days, a 60-day notice of action will be issued reducing the voucher size in accordance with the policies in Chapter 5. If an eligible live-in aide is approved prior to the effective date of the notice of action; the notice of action will be rescinded. An applicant or transferring family must identify an eligible live-in aide prior to execution of the HAP contract.

Elsewhere in this chapter the policy is clear that all household members, including live-in aides must meet the mandatory eligibility requirements.

HACSD will deny the admission of a live-in aide as outlined in 24 CFR 982.316(b) and 24 CFR Part 982.553 in accordance with the prohibition period outlined in Chapter 3. In particular, the HACSD will deny admission of a live-in aide for criteria outlined under 24 CFR Part 982.553(a)(ii)(3) for permissive prohibitions to prohibit program admission for “other criminal activity which may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity.”

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD establishes income limits for all areas of the country and publishes them annually in the *Federal Register*. They are based upon estimates of median family income with adjustments for family size. The income limits are used to determine eligibility for the program and for income targeting purposes as discussed in this section.

Definitions of the Income Limits [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed the federal poverty level or 30 percent of the median income for the area, whichever number is higher.

Area median income is determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 982.201]

Income limits are used for eligibility only at admission. Income eligibility is determined by comparing the annual income of an applicant to the applicable income limit for their family size. In order to be income eligible, an applicant family must be one of the following:

- A *very low-income* family
- A *low-income family* that has been "continuously assisted" under the 1937 Housing Act. A family is considered to be continuously assisted if the family is already receiving assistance under any 1937 Housing Act program at the time the family is admitted to the HCV program [24 CFR 982.4; 24 CFR 982.201(b)]

HACSD Policy

The HACSD will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list.

- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173
- A low-income or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract on eligible low-income housing as defined in 24 CFR 248.101

HUD permits the PHA to establish additional categories of low-income families that may be determined eligible. The additional categories must be consistent with the PHA plan and the consolidated plans for local governments within the PHA's jurisdiction.

HACSD Policy

The HACSD has not established any additional categories of eligible low-income families.

Using Income Limits for Targeting [24 CFR 982.201]

At least 75 percent of the families admitted to the PHA's program during a PHA fiscal year must be extremely low-income families. HUD may approve exceptions to this requirement if the PHA demonstrates that it has made all required efforts but has been unable to attract an adequate number of qualified extremely low-income families.

Families continuously assisted under the 1937 Housing Act and families living in eligible low-income housing that are displaced as a result of prepayment of a mortgage or voluntary termination of a mortgage insurance contract are not counted for income targeting purposes.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. Eligible immigrants are persons who are in one of the HUD-specified immigrant categories and must have their status verified by the U.S. Citizenship and Immigration Services (USCIS). At least one family member must be a citizen, national, or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance. For the citizenship/eligible immigration requirement, the status of each member of the family, except live-in aides and foster children, is considered individually before the family's status is defined. A live-in aide's legal residency will be confirmed through documents. The legal residency of foster children/adults will be verified with the placement agency.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, cohead, and any other family member 18 or older, and by a parent or guardian for minors. Each family member must declare their status once. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration as verification of their status. However, HUD regulations permit the PHA to request additional documentation of their status, such as a passport.

HACSD Policy

Family members who declare U.S. citizenship or national status will not be required to provide additional documentation unless the HACSD receives information indicating that an individual's declaration may not be accurate.

Eligible Noncitizens

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with PHA efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia, and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [Public Law 106-504].

Ineligible Noncitizens

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a noncontending family members listing, signed by the head, spouse, or cohead (regardless of citizenship status), indicating their ineligible immigration status. The PHA is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [24 CFR 5.522]. Non-Citizen students on student visas are ineligible members, even though in the country lawfully. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family. Non-Citizen Students sign a declaration, but they are listed on the statement of ineligible members.

Mixed Families [24 CFR 5.518]

A family is eligible for assistance as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered mixed families. Such families will be given notice that their assistance will be prorated, and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 16 for a discussion of informal hearing procedures.

Under the non-citizens rule, "mixed" families are families that include at least one citizen or eligible immigrant and any number of ineligible members.

The non-citizens rule was implemented prior to November 29, 1996, and "mixed" families who were participants as of June 19, 1995, shall continue receiving full assistance if they meet all of the following criteria:

The head of household or spouse is a U.S. citizen or has eligible immigrant status; and

All members of the family other than the head, the spouse, parents of the head or the spouse, and children of the head or spouse, are citizens or eligible immigrants. The family may change the head of household to qualify for this provision.

Ineligible Families [24 CFR 5.514(d), (e), and (f)]

A PHA may elect to provide assistance to a family before the verification of the eligibility of the individual or one family member [24 CFR 5.512(b)]. Otherwise, no individual or family may be assisted prior to the affirmative establishment by the PHA that the individual or at least one family member is eligible. Verification of eligibility for this purpose occurs when the individual or family members have submitted documentation to the PHA in accordance with program requirements [24 CFR 5.512(a)].

HACSD Policy

The HACSD will not provide assistance to any family prior to the affirmative establishment and verification of the eligibility of at least one member of the family.

Applicant families that include no eligible members are ineligible for assistance. Such families will be denied admission and offered an opportunity for a hearing.

When a PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice of the determination.

Timeframe for Determination of Citizenship Status [24 CFR 5.508(g)]

For new occupants joining the assisted family, the PHA must verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, the HACSD will grant such an extension for no more than 30 days [24 CFR 5.508(h)].

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

HACSD Policy

For applicants, verification of U.S. citizenship/eligible immigrant status occurs at the same time as verification of other eligibility factors.

For participants, the HACSD will verify the U.S. citizenship/eligible immigration status no later than the date of the family's first annual reexamination following the enactment of the Quality Housing and Work Responsibility Act of 1998.

For family members added after other members have been verified, the verification must take place prior to the new member's addition to the household.

The HACSD will grant an extension of 30 days for families to submit evidence of eligible immigrant status.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218, Notice PIH 2018-24]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. If a child under age six has been added to an applicant family within six months prior to voucher issuance, an otherwise eligible family may be admitted to the program and must disclose and document the child's SSN within 90 days of the effective date of the initial HAP contract. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status.

In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants aged 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in 24 CFR 5.216.

The HACSD may defer termination and grant an extension of additional 90 calendar days to disclose a SSN, but only if the HACSD, in its discretion, determines that the participant's failure to comply was due to circumstances that could not have reasonably been foreseen and were outside the control of the participant; and there is a likelihood that the participant will be able to disclose a SSN by the deadline. If, upon expiration of the provided time period, the participant fails to produce a SSN, the family's assistance will be terminated.

If the family is otherwise eligible to participate in the program, the family may maintain their position on the waiting list for 180 days.

If the family member states s/he has not been issued a social security number by the SSA, the family member will be required to make such declaration in writing under penalties of perjury.

3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 5.230; HCV GB]

HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/Privacy Act Notice, the form HUD-52675 Debts Owed to Public Housing Agencies and Terminations, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements.

The PHA must deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3)].

3-II.E. STUDENTS ENROLLED IN INSTITUTIONS OF HIGHER EDUCATION [24 CFR 5.612, FR Notice 4/10/06, FR Notice 9/21/16]

Section 327 of Public Law 109-115 and the implementing regulation at 24 CFR 5.612 established new restrictions on the eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be examined along with the income eligibility of the student's parents. In these cases, both the student and the student's parents must be income eligible for the student to receive HCV assistance. If, however, a student in these circumstances is determined independent from their parents in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's eligibility.

The new law does not apply to students who reside with parents who are applying to receive HCV assistance. It is limited to students who are seeking assistance on their own, separately from their parents.

Definitions

In determining whether and how the new eligibility restrictions apply to a student, the PHA will rely on the following definitions [FR Notice 4/10/06, FR Notice 9/21/16].

Dependent Child

In the context of the student eligibility restrictions, dependent child means a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of dependent in 24 CFR 5.603, which states that the dependent must be a member of the assisted family, other than the head of household or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student. Foster children and foster adults are not considered dependents.

Independent Student

HACSD Policy

The HACSD will consider a student “independent” from their parents and the parents’ income will not be considered when determining the student’s eligibility if the following four criteria are all met:

- The individual is of legal contract age under state law.
- The individual has established a household separate from their parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student.

To be considered an independent student according to the Department of Education, a student must meet one or more of the following criteria:

- The individual is at least 24 years old by December 31 of the award year for which aid is sought
- 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
- The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual’s state of legal residence
- The individual is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for other than training purposes
- The individual is a graduate or professional student
- The individual is married
- The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)
- The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:
 - A local educational agency homeless liaison
 - The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director
 - A financial aid administrator
 - The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances
- The individual was not claimed as a dependent by their parents pursuant to IRS regulations, as demonstrated on the parents’ most recent tax forms.
- The individual provides a certification of the amount of financial assistance that will be provided by their parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

If the PHA determines that an individual meets the definition of a vulnerable youth such a determination is all that is necessary to determine that the person is an independent student for the purposes of using only the student’s income for determining eligibility for assistance.

The PHA will verify that a student meets the above criteria in accordance with the policies in Section 7-II.E.

Institution of Higher Education

The PHA will use the statutory definition under section 102 of the Higher Education Act of 1965 to determine whether a student is attending an institution of higher education (see Exhibit 3-2).

Parents

HACSD Policy

For purposes of student eligibility restrictions, the definition of parents includes biological or adoptive parents, stepparents (as long as they are currently married to the biological or adoptive parent), and guardians (e.g., grandparents, aunt/uncle, godparents, etc.).

Person with Disabilities

The PHA will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a person with disabilities (see Exhibit 3-1).

Veteran

HACSD Policy

A veteran is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Vulnerable Youth

HACSD Policy

A vulnerable youth is 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:

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

The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence

The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

A local educational agency homeless liaison

The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director

A financial aid administrator

Determining Student Eligibility

If a student is applying for assistance on their own, apart from their parents, the PHA must determine whether the student is subject to the eligibility restrictions contained in 24 CFR 5.612. If the student is subject to those restrictions, the PHA must ensure that: (1) the student is individually eligible for the program, (2) either the student is independent from their parents or the student's parents are income eligible for the program, and (3) the "family" with which the student is applying is collectively eligible for the program.

HACSD Policy

For any student who is subject to the 5.612 restrictions, the HACSD will:

Follow its usual policies in determining whether the student individually and the student's "family" collectively are eligible for the program

Determine whether the student is independent from their parents in accordance with the definition of independent student in this section

Follow the policies below, if applicable, in determining whether the student's parents are income eligible for the program

Determining Parental Income Eligibility

HACSD Policy

For any student who is subject to the 5.612 restrictions and who does not satisfy the definition of independent student in this section, the income of the parents will be counted to determine income eligibility based on a written certification, under penalty of perjury, completed by the parents. The HACSD will determine the income eligibility of the student's parents, as follows:

If the student's parents are married and living together, the HACSD will obtain a joint income declaration and certification of joint income from the parents.

If the student's parent is widowed or single, the HACSD will obtain an income declaration and certification of income from that parent.

If the student's parents are divorced or separated, the HACSD will obtain an income declaration and certification of income from each parent.

If the student has been living with one of their parents and has not had contact with or does not know where to contact their other parent, the HACSD will require the student to submit a certification under penalty of perjury describing the circumstances and stating that the student does not receive financial assistance from the other parent. The HACSD will then obtain an income declaration and certification of income from the parent with whom the student has been living or had contact.

In determining the income eligibility of the student's parents, the HACSD will use the income limits that apply where the parent with the highest income lives.

**3-II.F. EIV SYSTEM SEARCHES [Notice PIH 2018-18; EIV FAQs; EIV System Training 9/3020]
Existing Tenant Search**

Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance.

If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.

HACSD Policy

HACSD will contact the PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or

50059, as applicable, showing an end of participation. HACSD will only approve assistance contingent upon the move-out from the currently occupied assisted unit.

Debts Owed to PHAs and Terminations

All adult household members must sign the form HUD-52675 Debts Owed to Public Housing and Terminations. Prior to admission to the program, the PHA must search for each adult family member in the Debts Owed to PHAs and Terminations module.

If a current or former tenant disputes the information in the module, the tenant should contact the PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If the PHA determines that the disputed information is incorrect, the PHA will update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.

HACSD Policy

HACSD will require each adult household member to sign the form HUD-52675 once at the eligibility determination. Any new members added to the household after admission will be required to sign the form HUD-52675 prior to being added to the household.

HACSD will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, HACSD will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.

Income and Income Validation Tool (IVT) Reports

For each new admission, the PHA is required to review the EIV Income and IVT Reports to confirm and validate family reported income within 120 days of the IMS/PIC submission date of the new admission. The PHA must print and maintain copies of the EIV Income and IVT reports in the tenant file and resolve any discrepancies with the family within 60 days of the EIV Income or IVT report dates.

Discrimination of a family, because it includes unwed parents, recipients of public assistance, or children born out of wedlock.

Discrimination of a family, because it includes children (familial status discrimination).

A family's participation in a family self-sufficiency program.

Other reasons as listed in under the "Fair Housing and Reasonable Accommodations" sections.

All screening and termination of assistance procedures will be administered fairly, and in such a way as not to violate rights to privacy or discriminate on the basis of race, color, religion, creed, sex, national origin, handicap, familial status, age, ancestry, marital status, sexual orientation, source of income, medical condition, gender, gender identity, gender expression, genetic information or any other unlawful basis.

To the maximum extent possible, the HACSD will involve other community and governmental entities in the promotion and enforcement of this policy.

This policy will be provided to applicants and participants upon request.

PHAs are authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the HCV program. This authority assists the PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records the PHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

HACSD Policy

The HACSD verifies the criminal history of all adults, live-in aides and adult foster children at the time of program admission; adults, live-in aides, and adult foster children admitted to the assisted household; adults, live-in-aides, and adult foster children who port into the jurisdiction of the HACSD; adults, live-in aides, and adult foster children transferring to another assisted unit, and may verify the criminal history of all adults in the household on a regular basis. If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, the PHA will request a fingerprint card and will request information from the National Crime Information center (NCIC).

PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided.

HACSD Policy

Criminal background verification is conducted by researching criminal history, including status of a family member subject to a sex-offender registration requirement of a state sex-offender registration program, by accessing the database of the San Diego County Sheriff's Department or similar database, or by sending written inquiries to states where the HACSD will screen all incoming portability admissions and participants for criminal history and registered sex-offender status. [24 CFR 982.553(a)(2)(i)], [Notice PIH 2012-28].

The criminal history of participants/applicants, live-in aides, and adult foster children may be verified through the Department of Justice, and these applicants/participants may be required to provide fingerprints.

The HACSD will ensure that any report of criminal record received is maintained confidentially, not misused or improperly disseminated, and destroyed once the purpose for which it was requested is accomplished, including expiration of the period for filing a challenge to the HACSD action without institution of a challenge or final disposition of any such litigation [24 CFR

5.903(g)]. However, a record of the screening including the date performed must be retained [Notice PIH 2012-28]. This requirement does not apply to information that is public information or is obtained by a PHA other than under 24 CFR 5.905.

All reports of criminal records, while needed, will be housed in a secure area with access limited to individuals responsible for screening and determining eligibility for initial and continued assistance, as well as management.

The HACSD will document in the family's file the circumstances of any verified criminal activities.

If the PHA proposes to deny assistance based on a criminal record or on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission. [24 CFR 5.903(f) and 5.905(d)].

Screening for Suitability as a Tenant [24 CFR 982.307]

The PHA has no liability or responsibility to the owner for the family's behavior or suitability for tenancy. The PHA has the authority to conduct additional screening to determine whether an applicant is likely to be a suitable tenant.

HACSD Policy

The HACSD will not conduct additional screening to determine an applicant family's suitability for tenancy. The HACSD will take into consideration any of the criteria for admission described in the chapter on eligibility factors. The HACSD will not be liable or responsible to the owner or other persons for the family's behavior or the family's conduct in a tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before HACSD approval of tenancy, the HACSD will inform the owner that screening and selection for tenancy is the responsibility of the owner. An owner may consider a family's history with respect to factors such as: payment of rent and utilities, caring for a unit and premises, respecting the rights of other residents to the peaceful enjoyment of their housing, criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

HUD requires the PHA to provide prospective owners with the family's current and prior address (as shown in PHA records) and the name and address (if known) of the owner at the family's current and prior addresses. HUD permits the PHA to provide owners with additional information, as long as families are notified that the information will be provided, and the same type of information is provided to all owners.

The PHA may not disclose to the owner any confidential information provided to the PHA by the family in response to a PHA request for documentation of domestic violence, dating violence, sexual assault, or stalking except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(a)(4)].

HACSD Policy

In accordance with HUD requirements, the HACSD will furnish prospective owners the family's current and prior address as shown in its records, and, if known to the HACSD, the associated landlord contact information.

The HACSD will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, *at the time of the initial HQS inspection or before*. The PHA will not provide any additional information to the owner, such as tenancy history or criminal history, etc.

The HACSD will inform owners that it is the responsibility of the landlord to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, payment of utility bills, eviction history, respecting the rights of other residents, damage to units, drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

A statement of the HACSD's policy on release of information to prospective landlords is applied uniformly to all families and will be included in the family's briefing packet.

The owner may request the HACSD obtain and review criminal or sex-offender registration records for grounds to deny a tenant application or evict a tenant. The HACSD will charge the owner a fee based on the costs incurred by the HACSD, including the costs charged by the law enforcement agency, the HACSD staff time and administrative costs. The owner may not charge the tenant for this fee.

The HACSD must not release any criminal information or sex-offender information to the owner, but a Housing Supervisor will review the information, and if no information relevant to application or eviction is found, will notify the owner. If information relevant to the application or eviction is found, the Housing Supervisor will present their findings in writing to the Program Coordinator, who will authorize the findings and sign the letter issued to the owner. The letter will not specify the criminal or sex-offender history but will merely state that there may be cause for denial or eviction of the tenant. If the owner sends documentation of needing specific information for an eviction, the Program Coordinator must approve the release of any information in accordance with the regulations [24 CFR 5.903, 24 CFR 5.905].

The HACSD must NEVER release specific personal information to owners regarding their former Section 8 tenants.

3-III.E. CRITERIA FOR DECIDING TO DENY ASSISTANCE

Evidence [24 CFR 982.553(c)]

HACSD Policy

The HACSD will use the concept of the preponderance of the evidence as the standard for making all admission decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not.

Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Credible evidence may be obtained from police and/or court records. Testimony from neighbors, when combined with other factual evidence, can be considered credible evidence. Other credible evidence includes documentation of drug raids, arrest warrants, or an inspection of the unit for violations of family obligations.

If the HACSD determines, based on a preponderance of the evidence, that a household member, or guest, has engaged in prohibited criminal activity or violated family obligations, the HACSD will terminate assistance.

Extenuating circumstances may be considered by the Program Coordinator if the responsible family member has no prior history of program violations and/or complaints, the violations did not involve violent or drug-related criminal activities, and/or only if the family member provides compelling medical documentation indicating the family member was incapacitated during the

time the program violations occurred to such a degree that the family member was clearly incapable of understanding program requirements. Furthermore, the means of violation detection and subsequent family truthfulness and cooperation will be taken into consideration.

The HACSD will not take action to deny or terminate assistance for lease violations, criminal activities, or other good cause if the violations occurred as a result of a family member being the victim of domestic violence, dating violence, stalking, or a survivor of sexual assault unless the HACSD can demonstrate that the act poses an actual or imminent threat to other tenants or those employed at or providing service to the property. When a participant family is facing housing assistance termination because of the actions of a participant, household member, guest, or other person under the participant's control and a participant or a participating family member claims to be a victim of such actions and that the actions are related to domestic violence, dating violence, stalking, or a survivor of sexual assault, the PHA may require the individual to submit documentation affirming that claim. If the HACSD can demonstrate there is an actual and imminent threat to other participants or those employed at or providing service to the property if the participant's program participation is not terminated, the HACSD will bypass the standard process and proceed with the immediate termination of the family's assistance. The HACSD will take action to exclude the perpetrator from the assisted household if it is found that one assisted family member has committed an act of domestic violence against another assisted family member.

In the case of lease violations, the family must make full restitution to the landlord as demonstrated by a landlord's full release and proof of payment. In addition, if the violations resulted in overpaid housing assistance payments, the family may, depending on the size of the overpayment, be allowed to remain on the program if the family enters into a repayment agreement and the payments are kept current.

If a family is found ineligible due to non-compliance as a result of a disability, the HACSD may delay the denial or termination in order to determine if the problem could be corrected by reasonable accommodation in conformance with this Plan's reasonable accommodation policy.

Consideration of Circumstances [24 CFR 982.552(c)(2)] [PIH Notice 2015-19]

HUD authorizes, but does not require, the PHA to consider all relevant circumstances when deciding whether to deny or terminate a family's assistance, except in the situations for which denial or termination of assistance is mandatory. See section 12-II.D for the HACSD policy regarding Consideration of Circumstances.

Removal of a Family Member's Name from the Application

Should the PHA's screening process reveal that an applicant's household includes an individual subject to state lifetime registered sex offender registration, the PHA must offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the PHA must deny admission to the family [Notice PIH 2012-28].

For other criminal activity, the PHA may permit the family to exclude the culpable family members as a condition of eligibility. [24 CFR 982.552(c)(2)(ii)].

HACSD Policy

As a condition of receiving assistance, a family may agree to remove the culpable family member from the application. In such instances, the head of household must certify that the family member will not be permitted to stay overnight, or reside in the assisted unit, receive mail or otherwise have an ongoing presence in the unit.

After admission to the program, the family must present evidence of the former family member's current address upon PHA request.

Reasonable Accommodation [24 CFR 982.552(c)(2)(iv)]

If the family includes a person with disabilities, the PHA's decision concerning denial of admission is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

HACSD Policy

If denial of admission is based on behavior due to a disability, the HACSD will delay the denial in order to determine if the problem could be corrected by reasonable accommodation. For example, a visually impaired person fails to return information because the request for information was in writing. The HACSD then makes a reasonable accommodation, upon request, to call the person to tell the person the information that is needed.

However, a reasonable accommodation will not be granted if to do so would create an undue financial or administrative burden or result in a fundamental alteration in the nature of the program, such as to waive the prohibition on certain criminal acts (conviction for drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing or a household member is subject to a lifetime registration requirement under a State sex offender registration program). If an accommodation is determined to create an undue financial or administrative burden or would result in a fundamental alteration of the nature of the program, the HACSD will engage in an interactive process with the person to see if there is some other reasonable accommodation that would correct the problem.

When applicants are denied placement on the waiting list or program admission, the presence of a disability is considered a mitigating circumstance during the informal review or informal hearing process, if the applicant did not respond to a request by the PHA for information due to a disability.

However, the presence of a disability is never considered a mitigating factor for certain criminal activities (conviction for drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing or a household member subject to a lifetime registration requirement under a State sex offender registration program).

3-III.F. NOTICE OF ELIGIBILITY OR DENIAL

If the family is eligible for assistance, the PHA will notify the family in writing and schedule a tenant briefing, as discussed in Chapter 5.

If the PHA determines that a family is not eligible for the program for any reason, the family must be notified promptly. The notice must describe: (1) the reasons for which assistance has been denied, (2) the family's right to an informal review, and (3) the process for obtaining the informal review [24 CFR 982.554 (a)]. See Chapter 16, for informal review policies and procedures.

HACSD Policy

The family will be notified of a decision to deny assistance in writing within 10 business days of the determination.

If a PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. In addition, a copy of the record must be provided to the subject of the record [24 CFR 5.903(f) and 5.905(d)]. The PHA must give the family an opportunity to dispute the accuracy and relevance of that record, in the informal review process in accordance with program requirements [24 CFR 982.553(d)].

HACSD Policy

If based on a criminal record or sex offender registration information, an applicant family appears to be ineligible the HACSD will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the HACSD to dispute the information within that 10-day period, the HACSD will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal review process.

Notice requirements related to denying assistance to noncitizens are contained in Section 3-II.B.

Notice policies related to denying admission to applicants who may be victims of domestic violence, dating violence, sexual assault or stalking are contained in Section 3-III.G.

3-III.G. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING

The Violence against Women Act of 2013 (VAWA) and the HUD regulation at

24 CFR 5.2005(b) prohibit PHAs from denying an applicant admission to the HCV program on the basis or as a direct result of the fact that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, if the applicant otherwise qualifies for assistance or admission.

Definitions of key terms used in VAWA are provided in section 16-IX of this plan, where general VAWA requirements and policies pertaining to notification, documentation, and confidentiality are also located.

Notification

VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a VAWA Notice of Occupancy Rights (form HUD– 5380) and a domestic violence certification form (HUD-5382) at the time the applicant is denied.

HACSD Policy

The HACSD acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, poor rental history, a record of previous damage to an apartment, a prior arrest record) due to adverse factors that would warrant denial under the PHA's policies.

While the HACSD is not required to identify whether adverse factors that resulted in the applicant's denial are a result of domestic violence, dating violence, sexual assault, or stalking, the applicant may inform the HACSD that their status as a victim is directly related to the grounds for the denial. The HACSD will request that the applicant provide enough information to the HACSD to allow the HACSD to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim.

The PHA will include in its notice of denial the VAWA information described in section 16-IX.C of this plan as well as including a copy of the form HUD-5382. The PHA will request in writing that an applicant wishing to claim protection under VAWA notify the PHA within 14 business days.

Documentation

Victim Documentation [24 CFR 5.2007]

HACSD Policy

If an applicant claims the protection against denial of assistance that VAWA provides to victims of domestic violence, dating violence, sexual assault or stalking, the HACSD will request in

Chapter 4 - APPLICATIONS, WAITING LIST AND TENANT SELECTION

Introduction

This chapter describes HUD and HACSD policies for taking applications, managing the waiting list and selecting families for HCV assistance. The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how HACSD will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how HACSD's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for assistance. It also discusses the process HACSD will use to keep the waiting list current.

Part III: Selection for HCV Assistance. This part describes the policies that guide HACSD in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that HACSD has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the PHA policies for making applications available, accepting applications making preliminary determinations of eligibility, and the placement of applicants on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

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

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits the PHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. The PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application.

HACSD Policy

All persons who wish to apply for any of the HACSD's programs must submit pre-applications. The application for placement on the waiting list may be taken by telephone, in writing, on-line via a web-based internet applications system, or from an applicant who visits the office.

All pre-applications and applications will be made accessible to persons with disabilities. Reasonable accommodations will be provided upon request.

Bilingual staff is available to take waiting list applications of those with limited English proficiency or the services of the language line are utilized to assist applicants of limited English proficiency.

The full application is completed in the applicant's own handwriting, unless the applicant is a person with a disability who requests assistance or other accommodation. The HACSD staff may interview applicants to review the information on the full application form. Verification of disability as it relates to 504, Fair Housing or ADA reasonable accommodation may be requested at that time or mailed to the applicant.

When an interview is required, persons with disabilities unable to come to the HACSD office will be granted an accommodation by conducting the interview at the person's home or by telephone, upon verification of disability and disability-related need for the accommodation.

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.

In most cases, the applicant will not be interviewed, the information will not be verified, and eligibility will not be fully evaluated, until the applicant has been selected from the waiting list. Preferences will not be verified until selected from the waiting list [24 CFR 982.207].

All applicants will be treated equally on the waiting list in accordance with the preferences, policies and the regulations.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

Elderly and Disabled Populations [24 CFR 8 and HCV GB]

The PHA must take steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people

with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). The PHA must provide reasonable accommodation to the needs of individuals with disabilities. The pre-application process will be fully accessible. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure equal access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each complete application received and make a preliminary assessment of the family's eligibility. The PHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Ineligible for Placement on the Waiting List

HACSD Policy

Applicants will not be placed on the waiting list if the HACSD has information that indicates that they are ineligible, such as computer notes or alerts, or statements from the applicants. Applicants who have been or are in the process of being terminated from the Section 8 Rental Assistance Program or other federal housing programs for violent or drug-related criminal activities that involve sales or production will not be placed on the waiting list for three years from the date of termination. For all other violations, applicants will not be placed on the waiting list for three years from the date of termination. Applicants who owe money to a housing authority will not be placed on the waiting list until the debt is paid. If the applicant challenges the denial of placement on the waiting list, the applicant will be advised of their right to request an informal review.

Where a family is determined to be ineligible, HACSD will send written notification of the ineligibility determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review and explain the process for doing so (see Chapter 16).

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

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

The PHA's HCV waiting list is organized in such a manner to allow the PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

HACSD Policy

The HACSD, at the time of preliminary application, will collect the following information necessary for proper selection from the waiting list:

- Applicant name;
- Applicant Address
- Date and time of application;
- Qualification for any local preference;
- Gross annual income;
- Disabled or Elderly household;
- Racial or ethnic designation of the head of household;
- Other targeted program qualifications.

HUD permits, but does not require, PHAs to maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs. A family's decision to apply for, receive, or use other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

The HACSD uses a single waiting list for admission to its Section 8 tenant-based assistance program. The HACSD will not merge its waiting lists [24 CFR 982.205]. However, if the Section 8 waiting list is open when the applicant is placed on the Public Housing Program, another project-based voucher program or the Moderate Rehabilitation Program waiting lists, the HACSD must offer to place the family on the tenant-based assistance list.

Moderate Rehabilitation Program applicants may be taken from the Section 8 waiting list. Mainstream Program applicants are taken from the Section 8 waiting list.

A family who lives in the jurisdiction of another cooperative housing authority, named below, will be advised of the benefit of being placed on the appropriate housing authority's waiting list, and the information will be forwarded to the appropriate cooperative housing authority upon verbal permission of the family.

Cooperative Agreement

population

- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

HACSD Policy

The HACSD will, on a regular basis, publicize and disseminate information to make known the availability of housing assistance, and related services for very low-income families. If the HACSD's waiting list is closed and then reopened, the HACSD will publicize the availability and nature of housing assistance for very low-income families in a newspaper of general circulation, minority media or by other suitable means.

To reach persons who cannot read newspapers, the HACSD will distribute fact sheets to the broadcasting media and may initiate personal contacts with members of the news media and community service personnel. The HACSD may also utilize public service announcements.

The HACSD will communicate the status of housing assistance availability to other service providers in the community and advise them of housing eligibility factors and guidelines so they can make proper referrals to those in need of housing assistance.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

HACSD Policy

Applicants are required to inform the HACSD of changes in address. Applicants are also required to respond to requests from the HACSD to update information on their application, or to determine their continued interest in assistance. Changes in an applicant's circumstances while on the waiting list may affect the family's entitlement to a preference. Applicants are responsible for notifying the HACSD, preferably through the online Applicant portal, when their circumstances change.

When an applicant claims an additional preference, the applicant will be placed on the waiting list in the appropriate order determined by the newly claimed preference.

Applicants on the waiting list with equal preference status will be organized by date and time of their applications.

Change of Head of Household While on the Waiting List

While the applicant is on the waiting list, the HACSD will not change the head of household unless it receives either: (1) a notarized statement from the head of household requesting the head of household be changed and documentation indicating the replacement was residing with the head of household at the time of the original application; (2) the head of household's death certificate, if head of household died **and** proof that the person requesting to become head of household was a significant other who resided with that person at the time of that person's death (utility bills and lease agreement reflecting address on record, marriage certificate, joint bank account statements, jointly-owned property, etc.). However, once the applicant is selected from the waiting list, the listed head of household must be included in the eligibility determination.

An estranged significant other may be allowed to take the place of the head of household if s/he can provide documentation indicating s/he resided with the head of household at the address reflected on the waiting list records and was part of the head of household's family unit (lease agreement, notarized statement from property owner, joint bank account or other property). Before this change is made, a letter must be mailed to the head of household advising him/her that a request has been made to change their status on the waiting list. S/he will be advised

that s/he will be dropped from the waiting list if s/he does not respond within 14 days. If there is no response by the deadline, a phone call will be attempted and documented. After that, providing the requester provides adequate documentation, the head of household may be changed to the remaining significant other. All documentation of this action must be retained for five years.

Information regarding a person's waiting list status may only be provided to the applicant. The HACSD must receive a written release of information from the applicant before information will be provided to a third party. Verbal authorization may be allowed as a one-time release of information. Ongoing release must be supported by a written authorization.

4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]

HUD requires the PHA to establish policies to use when removing applicant names from the waiting list.

Purging the Waiting List

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)].

HACSD Policy

The waiting list may be purged periodically to ensure that it is current and accurate. In order to purge the waiting list, the HACSD will perform outreach efforts to notify the public that the waitlist will be updated. All notifications will provide the date by which a specified action must be taken and failure to do so will result in the applicant's name being inactivated on the waiting list. The HACSD will notify the public by using one or more of the methods listed below:

- A notice will be mailed asking applicants for confirmation of continued interest.
 - Publication in local newspapers of general circulation, as well as minority media
 - Social Media postings
 - English and Spanish flyers in County libraries
 - Postings on HACSD's website
 - County press releases
 - Community meetings
 - Emails to cities managers and Housing Departments within the HACSD's jurisdiction
- If the applicant provides information that s/he did not respond to the notice because of a family member's disability, they may be entitled to reinstatement as a reasonable accommodation. The HACSD will reinstate the applicant at the original date and time of application. The family will also be reinstated if there is a reasonable possibility that the family was not notified due to circumstances that were beyond the family's control.

Removal from the Waiting List

HACSD Policy

Applicants who reapply to be placed back on the waiting list will be positioned on the waiting list as of the date and time they reapply.

If the family declines the offer of a voucher after the completion of the eligibility process, the family will not be eligible to be returned to the waiting list. The family must reapply to the waiting list.

A family whose application is denied for failure to provide information must reapply to be placed back on the waiting list.

A family found ineligible for assistance must reapply to be placed back on the waiting list.

Applicants found ineligible for assistance because they exceed the current HUD published Section 8 income limits must reapply to be placed back on the waiting list.

Applicants removed from the waiting list will be given the benefit of the doubt if there is a reasonable possibility, they were removed from the waiting list through no fault of their own. These applicants may be reinstated on the waiting list if there is a reasonable possibility they were not notified, such as in the case of only one notice being issued or that they had reported an address change that was not entered in the system through no fault of their own. In order to be reinstated, applicants must request reinstatement and declare under penalty of perjury that they had either submitted changes of address to the HACSD in a timely manner; that they had not changed their address; that they had not received the notice issued by the HACSD; or that they should be reinstated as a reasonable accommodation for disability.

If at any time an applicant family is on the waiting list, the HACSD determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because the HACSD has determined the family is not eligible for assistance, a notice will be sent to the family's address of record. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the HACSD's decision (see Chapter 16) [24 CFR 982.201(f)].

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The PHA will maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

HACSD Policy

Applicants will not be pulled from the waiting list for eligibility processing unless funding is available. Once funding is available, applicants will be pulled by preference group and income targeting guidelines and in proper order, as determined by their date and time of placement on the waiting list. The method of selection from the waiting list will be clearly documented [24 CFR 982.207(e)].

Special Admissions [24 CFR 982.203]

HACSD Policy

The HACSD may admit up to 10 percent of its annual admissions as special admissions [24 CFR 982.54(d)(3), 982.203]. However, these special admissions must be funded by special HUD-targeted funding. Examples of this special funding follow:

- A family displaced because of demolition or disposition of a public housing project
- A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project
- For housing covered under the Low-Income Housing Preservation and Resident Homeownership Act of 1990 (41 U.S.C. 4101, et seq.)
- A non-purchasing family residing in a project subject to a homeownership program (under 24 CFR 248.173)
- A family displaced because of mortgage prepayment or voluntary termination of a mortgage insurance contract (as provided in 24 CFR 248.165)
- A family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term
- A non-purchasing family residing in a HOPE 1 or HOPE 2 project

Targeted Funding [24 CFR 982.204(e)]

HUD may award a funding for a specified category of families on the waiting list. The PHA must use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the PHA may skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

HACSD Policy

Participants admitted under targeted funding provisions must meet applicable verification and eligibility requirements. The HACSD administers the following types of targeted funding:

Mainstream: Mainstream vouchers are awarded to non-elderly disabled families on the HCV waiting list. HACSD applies local preferences in determining the order in which Mainstream vouchers are awarded to eligible families.

Veterans Affairs Supportive Housing (VASH): HUD allocated funding to provide Housing Choice Voucher (HCV) tenant-based rental assistance for qualifying homeless veterans referred by the Department of Veterans Affairs.

Family Unification Program (FUP): FUP vouchers serve Child Welfare involved families and youth who lack adequate housing. Vouchers are administered in partnership with HHSA Child Welfare Services (CWS).

Emergency Housing Voucher Program (EHV): EHV vouchers serve individuals and families referred by the Regional Taskforce on Homelessness (RTFH) who are experiencing or at risk of experiencing homelessness and meet specific prioritization criteria. A separate waitlist serves the EHV program.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

This section describes 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 GB]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion.

HACSD Policy

HACSD has established local preferences that are consistent with the HACSD Plan.

When determining equally ranked preferences, the date and time of application is the final deciding factor.

Super Preference

Families in good standing participating in the HACSD's Housing Choice Voucher program who have been terminated due to insufficient funding have a super preference to the categories listed below and have first priority for selection from the Housing Choice Voucher program waiting list when the HACSD resumes issuing vouchers to applicants according to the policies in Chapter 12-I.E. of the Plan.

Special Local Preferences

The HACSD has established special local preferences for six groups:

(1) HACSD Public Housing residents referred by the Public Housing administrator who must move due to being the victims of domestic violence, dating violence, sexual assault, or stalking; or is seeking an emergency transfer under VAWA from the PHA's public housing program;

(2) HACSD Public Housing residents referred by the Public Housing Administrator who must move out of their units for a significant period of time, as determined by the Public Housing Administrator, in order for repairs to be made to their HACSD Public Housing units;

(3) HACSD Public Housing residents who are eligible for a reasonable accommodation and for whom a right sized unit is unavailable for more than 90 days;

(4) Eligible homeless applicants who have been referred by the Regional Taskforce on Homelessness agency members, and either:

- a) Meet the definition of homelessness and referral criteria, as determined by HACSD/HCDSD programs, or;
- b) Are exiting federally-assisted, locally-assisted, or state-assisted HACSD/HCDSD administered housing programs with no other permanent housing placement options;

(5) Eligible non-elderly disabled applicants who, (a) have been referred by the County of San Diego, Health and Human Services Agency, and (b) who are homeless or who are exiting an institution or segregated setting as defined in Chapter 18-I.

(6) Eligible households referred by County of San Diego partners in the below categories:

- a) Approximately 20 referrals from the Public Safety Group for persons fleeing domestic violence or sex trafficking within the San Diego region
- b) Approximately 60 referrals from Health and Human Services Agency, Aging and Independence Services in collaboration with the Office of Homeless Solutions for elderly families (Head, spouse, or co-head is at least 62 years of age) who are experiencing housing insecurity as determined by the referring partner

The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed. ***Note:** Special local preference group (4) will have a maximum of 1000 vouchers available to those who meet the criteria. Special local preference group (5) will have a maximum number of 138 vouchers available to those who meet the criteria. Special local preference group (6) will have a maximum number of 80 vouchers available for those who meet the criteria. HACSD has the discretion to redistribute vouchers between referral partners.

* These selection preferences are rated higher than the following ranking preferences.

Residency Preference [24 CFR 982.207(b)]

- A family who, at the time of selection, lives or includes a member who works or has been notified that they are hired to work in the HACSD jurisdiction regardless of length of time, *and* are in one of the local preference categories listed below.

Use of the residency preference will not have the effect of delaying or otherwise denying admission to the program based on the race, color, ethnic origin, gender, religion, disability, or age of any member of an applicant family. Prioritization will be established in combination with the local preferences indicated below.

Category One

The HACSD uses equally weighted local preferences for applicants, with priorities for those *who meet the residency preference in the HACSD jurisdiction* at the time of selection and are in one or more of the following categories:

- Families with dependent children
- Working Families:
 - The Head of household, spouse or sole household member is employed (must have worked an average of at least 20 hours per week for the previous 6 months. Applicants may combine job training or employment preparatory

academic program participation as part of the previous 6-month requirement, or

- The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits at the time of selection, or
- The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207 (b)(2)].
- Elderly families: The Head of household or spouse is 62 years of age or older.
- Disabled families: At least one household member is disabled.
- Veterans or surviving spouses of veterans: A veteran with a dishonorable discharge does not qualify for this preference.
- Homeless: "homeless individual," "homeless person," or "homeless family" per HUD's Definition of Homeless for the Continuum of Care (CoC) Program (previously Shelter Plus Care)

Category Two

Applicants who, at the time of selection, meet the residency preference in the HACSD jurisdiction, but who do not fit into Category One.

Category Three

Applicants who do not live or work within the HACSD jurisdiction, but are one or more of the following:

- Families with dependent children
- Working Families:
 - The Head of household, spouse or sole household member is employed at the time of selection (must have worked an average of at least 20 hours per week for the previous 6 months). Applicants may combine job training or employment preparatory academic program participation as part of the previous 6-month requirement, or
 - The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits, or
 - The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207 (b)(2)].
- Elderly families: The Head of household or spouse is 62 years of age or older.
- Disabled families At least one household member is disabled.
- Veterans or surviving spouses of veterans: A veteran with a dishonorable discharge does not qualify for this preference.
- Homeless: "homeless individual," "homeless person," or "homeless family" per HUD's Definition of Homeless for the Continuum of Care (CoC) Program (previously Shelter Plus Care)

Category Four

All other applicants not listed above.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at

or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low-income families admitted to the program that are “continuously assisted” under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

HACSD Policy

The HACSD will reserve a minimum of 75 percent of its Section 8 new admissions for families whose income does not exceed 30 percent of the area median income (AMI) or the federal poverty level. The HACSD will admit families who meet the HACSD preferences and who qualify under the extremely low-income limit to meet the income-targeting requirement. The HACSD’s income-targeting requirement does not apply to low-income families continuously assisted, as provided for under the U.S Housing Act of 1937. The HACSD is also exempted from this requirement when aiding low-income or moderate-income families entitled to preservation assistance under the tenant-based program as a result of a mortgage prepayment or opt-out. The HACSD may, at least annually, exercise the “fungibility” provision of the QHWRA. This provision allows the HACSD to admit less than the required minimum 40 percent of extremely low-income families in a fiscal year to its public housing program if the admission of extremely low-income families in the tenant-based assistance program exceeds seventy-five percent (75%) of all admissions during the fiscal year. Upon exercising this option, the HACSD will follow the fungibility threshold limitations as set forth in QHWRA legislation. The HACSD-determined fungibility procedures are reflected in its Public Housing Admissions and Continued Occupancy Policy.

Order of Selection

The PHA system of preferences may select families based on local preferences according to the date and time of application or by a random selection process (lottery) [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the waiting list, it is not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

HACSD Policy

The HACSD will select families according to date and time of application within preference groups. The HACSD will skip over families to select families that meet specific criteria if it receives targeted funding for those specific families. The HACSD cannot select families for admission to the program in an order different from the order on the waiting list for the purpose of selecting lower-cost families for admission to the program.

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify and in accordance with the HACSD’s hierarchy of preferences. Within each targeted funding or preference category, families will be selected according to the date and time their waiting list application is received.

Eligibility processing for a family selected from the waiting list is based on the information provided on the eligibility declaration, the supporting documents submitted and independent verification by the HACSD. The family must be eligible for the preferences it has claimed, income limits and targeting, and jurisdiction priority as of the date it was pulled from the waiting list.

A family change in circumstances after the date the family was selected from the waiting list for eligibility processing will not be evaluated for a possible change in preference status, jurisdiction, income limits and targeting, unless the family change in circumstances prior to voucher issuance results in the family's income exceeding 50% of area median income (AMI), in which case the family must be denied program admission.

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months, in accordance with the HACSD's interim policy, unless the additions are due to birth, adoption, marriage or registered domestic partnership, court-awarded custody, return of minor or disabled children, or elderly or disabled dependents to the household.

Requests for removal of household members from the application may be considered at the discretion of the Housing Authority prior to confirmation of preference and determination of eligibility. The following scenarios are handled as follows:

Scenario Number One

A family met admission preferences and income targeting requirements as of the point of time of being selected from the waiting list, but during the full application process, the family moved outside of the HACSD's jurisdiction. The family may continue to be processed for admission.

Scenario Number Two

A family was over 50% AMI at the time it was selected from the waiting list, but then the income was reduced because of termination of employment. The family must be denied as being over income at the time it was pulled off the waiting list and must reapply.

Scenario Number Three

A family was at or below 30% AMI at the time it was selected from the waiting list. Then its income increased to over 30% of AMI, but at or below 50% of AMI, prior to completion of the full application and issuance of the voucher. The family met the income targeting requirements when it was pulled off the waiting list and is still income-eligible at completion of the full application and issuance of the voucher, so the family may be processed for admission.

Scenario Number Four

The family was income-eligible at the time it was selected from the waiting list but started working prior to the completion of the full application, which resulted in the family's income exceeding 50% of the AMI. The family must be denied as over-income and future changes in the family's circumstances cannot be considered; e.g., the family member quits their job. The family must reapply to the waiting list.

Scenario Number Five

The family's income increases after it was issued a voucher. The income increase will be handled in accordance with the HACSD's current interim policy.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family [24 CFR 982.554(a)].

HACSD Policy

The HACSD will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview.

Preference Review

All preferences claimed on the pre-application, or while the family is on the waiting list, will be verified after selection from the waiting list.

The family's preference will be determined at the time the full application is completed, but the family must meet the preference at the date of selection from the waiting list as preference determines the family's placement on the waiting list.

After a family is selected from the waiting list, applicants will be required to complete a full application and provide all requested documentation and information. The full application will be mailed to the applicant. The applicant must complete the full application.

Pre-Screening

Applicants pulled from the waiting list may be mailed a pre-screening application for the purpose of obtaining the applicant's self-certification of eligibility. The pre-screening application serves as a preliminary evaluation of the eligibility of waiting list applications. In addition to the pre-screening application, the applicant may be asked to provide supporting documents, such as pay stubs and bank statements.

If the pre-screening application indicates the applicant is eligible, the applicant will then be issued a full-eligibility application. The full application includes Form HUD-90026, Supplement to Application for Federally Assisted Housing. In evaluating the pre-screening applications, the HACSD generally will determine income eligibility based on the higher annual income calculated, although the HACSD will review the information in its entirety to make its determination. Those denied based on the pre-screening application will be offered the opportunity to request an informal review.

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months in accordance with the HACSD's interim recertification policy, unless the additions are due to birth, adoption, marriage or registered domestic partnership, court-awarded custody, return of minor or disabled children to the household, or elderly or disabled dependents.

If the family requests its name be returned to the waiting list at its former date and time of application prior to the completion of the eligibility process, the family may be returned to the waiting list as inactive unless it has been determined the family is ineligible.

Otherwise eligible applicants pulled from the waiting list and found not to meet preference or income-targeting requirements will be returned to the waiting list at original date/time of application.

Families whose annual income exceeds the income limit will be denied admission, removed from the waiting list, and offered an informal review.

Denials

Families determined to be ineligible will be notified in writing of the reason for denial, and given an opportunity to request an informal review or an informal hearing for a family denied because the family has no legal residents.

If the HACSD denies the applicant a preference [24 CFR 982.207] or for not meeting income targeting, it will notify the applicant in writing, indicating why and advising him/her of the opportunity to request an informal review with a departmental representative. If the preference or income targeting denial is upheld as a result of the review or the applicant does not request

a review, the applicant will be returned to the waiting list without benefit of the preference or income category. Applicants may exercise other rights if they believe they have been discriminated against.

Applicants who falsify documents or make false statements in order to qualify for any preference or income requirements will be removed from the waiting list.

4-III.E. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a face-to-face interview with a PHA representative [HCV GB]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability.

HACSD Policy

The HACSD may require a full application interview attended by all adult family members. The purpose of the interview is to discuss the family's circumstances in greater detail, to clarify information that has been provided by the family, and to ensure that the information is true and complete.

All adult family members must sign all appropriate areas of the housing application.

It is the applicant's responsibility to reschedule the interview if she/he misses the appointment. If the applicant does not reschedule or misses two scheduled meetings, the HACSD may reject the application. The interview may be held in the office, by telephone, or at the applicant's home, as a reasonable accommodation to a person with disabilities.

Applicants who fail to appear and want to reschedule a missed appointment must make the request in writing to reschedule no later than seven days after the original appointment date.

Reasonable accommodation, such as accessible offices, inclusion of an advocate, or a home visit, will be provided to a disabled family upon request. The disabled family's designee will be allowed to participate in the interview process at the family's request.

If an application is denied due to a failure to attend the full application interview, the applicant will be notified in writing and offered an opportunity to request an informal review.

All adult members must sign the HUD Form 9886, Release of Information; the application form; all HACSD-required supplemental documents; the declarations and consents related to citizenship/immigration status; a consent form to release criminal conviction records and to allow HACSD to receive and use records in accordance with HUD regulations; as well as any other documents required by the HACSD. Applicants may be required to sign additional release of information forms for information not covered by the HUD form 9886.

Applicants may not amend these documents or write notes of disclaimers on them. A family who alters any HACSD documents invalidates the documents.

Failure to complete required forms or provide requested information will be cause for denial of the application for failure to provide necessary certifications, releases, and documents, as required by HUD or the HACSD.

The HACSD will request additional documents or information in writing, if it determines, at or after the interview, that they are needed.

If the requested information is not supplied by the due date, the HACSD will provide the family a notification of denial for assistance in accordance with Chapter 3 of this Plan.

Applicant information is verified using the verification procedures outlined in this Plan. Family composition, income, allowances and deductions, assets, full-time student status, eligibility and rent calculation factors, eligible citizenship, criminal history, and other pertinent information will be verified. Verifications may not be more than 60 days old at the time of issuance of the voucher.

The head of household and the spouse/cohead will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to the PHA.

The head of household or spouse/cohead must provide acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity.) If the family representative does not provide the required documentation at the time of the interview, he or she will be required to provide it within 14 calendar days.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted funding admission, or selection preference that affected the order in which the family was selected from the waiting list.

HACSD Policy

Eligibility processing for a family selected from the waiting list is based on the information provided on the eligibility declaration, the supporting documents submitted and independent verification by the HACSD. The family must be eligible for the preferences it has claimed, income limits and targeting, and jurisdiction priority as of the date it was pulled off the waiting list.

A family change in circumstances after the date the family was selected from the waiting list for eligibility processing will not be evaluated for a possible change in preference status, jurisdiction, income limits and targeting, unless the family change in circumstances prior to voucher issuance results in the family's income exceeding 50% of area median income (AMI), in which case the family must be denied program admission.

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months, in accordance with the HACSD's interim policy, unless the additions are due to birth, adoption, marriage or registered domestic partnership, court-awarded custody, return of minor or disabled children, or elderly or disabled dependents to the household.

Applicants consisting of two families living together who apply together, (such as a mother and father with a daughter and her husband and/or children) will be treated as a family unit and are eligible for one voucher.

Income Changes During the Application Process:

Scenario Number One

A family met admission preferences and income targeting requirements as of the point of time of being selected from the waiting list, but during the full application process, the family moved outside of the HACSD's jurisdiction. The family may continue to be processed for admission.

Scenario Number Two

A family was over 50% AMI at the time it was selected from the waiting list, but then the income was reduced as a result of termination of employment. The family must be denied as being over income at the time it was pulled from the waiting list and must reapply.

Scenario Number Three

A family was at or below 30% AMI at the time it was selected from the waiting list. Then its income increased to over 30% of AMI, but at or below 50% of AMI, prior to completion of the full application and issuance of the voucher. The family met the income targeting requirements when it was pulled from the waiting list and is still income-eligible at completion of the full application and issuance of the voucher, so the family may be processed for admission.

Scenario Number Four

The family was income-eligible at the time it was selected from the waiting list but started working prior to the completion of the full application, which resulted in the family's income exceeding 50% of the AMI. The family must be denied as over-income and future changes in the family's circumstances cannot be considered; e.g., the family member quits their job. The family must reapply to the waiting list.

Scenario Number Five

The family's income increases after it was issued a voucher. The income increase will be handled in accordance with the HACSD's current interim policy

Determination of Eligibility

After the verification process is completed, the HACSD will make a final determination of eligibility [24 CFR 982.201]. This decision is based on information provided by the family, third-party documents, HACSD research, and the current eligibility criteria in effect. If the family is determined to be eligible, the HACSD will mail a notification of a scheduled briefing. The purpose of the briefing is to issue the voucher and orient the family to the program.

If the HACSD determines that the family is ineligible, the HACSD will send written notification of the ineligibility determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review (Chapter 16).

Families whose annual income exceeds the income limit will be denied admission, removed from the waiting list, and offered an informal review.

The household found not eligible to be processed for assistance will be mailed a notice explaining why and outlining their right to request an informal review within 14 days.

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list. The HACSD will notify the family in writing that it has been returned to the waiting list and will specify the reasons for it.

If the HACSD determines that the family is eligible to receive assistance, the HACSD will invite the family to attend a briefing in accordance with the policies in Chapter 5.

Chapter 5 – BRIEFINGS AND VOUCHER ISSUANCE

Introduction

This chapter explains the briefing and voucher issuance process. When a family is determined to be eligible for the Housing Choice Voucher (HCV) program, the PHA must ensure that the family fully understands the way the program operates and the family's obligations under the program. This is accomplished through both an oral briefing and provision of a briefing packet containing the HUD-required documents and other information the family needs to know to lease a unit under the program. Once the family is fully informed of the program's requirements, the PHA issues the family a voucher. The voucher includes the unit size for which the family qualifies based on the PHA's subsidy standards, as well as the issue and expiration date of the voucher. The voucher is the document that authorizes the family to begin its search for a unit and limits the amount of time the family has to successfully locate an acceptable unit.

This chapter describes HUD regulations and HACSD policies related to these topics in two parts:

Part I: Briefings and Family Obligations. This part details the program's requirements for briefing families orally, and for providing written materials describing the program and its requirements. It includes a particular focus on the family's obligations under the program.

Part II: Subsidy Standards and Voucher Issuance. This part discusses HACSD's standards for determining how many bedrooms a family of a given composition qualifies for, which in turn affects the amount of subsidy the family can receive. It also discusses the policies that dictate how vouchers are issued, and how long families have to locate a unit.

PART I: BRIEFINGS AND FAMILY OBLIGATIONS

5-I.A. OVERVIEW

HUD regulations require the PHA to conduct mandatory briefings for applicant families who qualify for a voucher. The briefing provides a broad description of owner and family responsibilities, explains the PHA's procedures, and includes instructions on how to lease a unit. This part describes how oral briefings will be conducted, specifies what written information will be provided to families, and lists the family's obligations under the program.

When eligibility has been determined, the HACSD conducts a mandatory briefing designed to ensure that families know how the program works. The briefing provides a broad description of owner and family responsibilities, the HACSD procedures, and the steps the families must take to lease a unit. In addition, families receive briefing packets which provide more detailed information about the program, including the benefits of moving outside areas of poverty and minority concentration. This chapter describes how briefings will be conducted, the information that will be provided to families, and the policies for changes in family composition.

5-I.B. BRIEFING [24 CFR 982.301]

Notification of Briefing

Prior to issuance of a voucher, the PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed in individual face-to-face meetings, through group briefing sessions, or via remote briefing sessions.

HACSD Policy

Families will be notified of their eligibility for assistance at the time they are invited to a briefing. The notice will be sent by first class mail and may also be sent by email if the family has provided a valid email address to the PHA.

The notice will advise the family of the type of briefing, who is required to be present at the briefing, and the date and time of the briefing. The notice will also inform the family of any additional requirements for in-person or remote briefings as addressed in relevant policy elsewhere in this section.

In-Person Briefings

At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.

HACSD Policy

In-person briefings will be conducted for eligible applicant families. Briefings will generally be conducted in group meetings. At the family's written request, the PHA may provide an individual briefing.

The head of household or spouse is required to attend a briefing after initial approval of eligibility. At the briefing, the head of household or spouse must sign the voucher and other required paperwork.

Families that attend group briefings and still need individual assistance will be referred to an appropriate HACSD staff person.

If the family includes a person with disabilities, the HACSD will make every reasonable effort to accommodate that person to ensure effective communication.

Briefings will be conducted in English. For limited English proficient (LEP) applicants, the HACSD will provide interpretation services in accordance with the HACSD's LEP plan (See Chapter 2). A family needing language services must provide a written or verbal request prior to the scheduled briefing. When necessary, the HACSD may reschedule an applicant's briefing to accommodate language services requests.

Attendance

HACSD Policy

Applicants who fail to attend the scheduled in-person briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).

Remote Briefings [Notice PIH 2020-32]

Remote briefings may be conducted over the phone, via video conferencing, or through other virtual platforms.

HACSD Policy

HACSD has the sole discretion to require that briefings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. If the PHA schedules a remote briefing, HACSD will conduct a face-to-face briefing upon request of the applicant as a reasonable accommodation for a person with a disability if safety and health concerns can be reasonably addressed.

In addition, the PHA will conduct a briefing remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have childcare or transportation that would enable them to attend the briefing, or if the applicant believes an in-person briefing would create an undue health risk. The PHA will consider other reasonable requests for a remote briefing on a case-by-case basis.

Accessibility Requirements for Persons with Disabilities and LEP Individuals

As with in-person briefings, the platform for conducting remote briefings must be accessible and the briefing conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual.

If no method of conducting a remote briefing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual their inability to participate in the remote briefing, and the PHA should consider whether postponing the remote briefing to a later date is appropriate or whether there is a suitable alternative.

Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances.

Limited English Proficiency (LEP) requirements also apply to remote briefings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote briefings.

Conducting Remote Briefings

The PHA must ensure that the lack of technology or inability to use technology for remote briefings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA must ensure that the family has appropriate technological access in order to fully participate in the remote briefing.

PHA Policy

Prior to scheduling the remote briefing, the PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. If the written notification is returned by the post office or the email is rejected, the PHA will contact the family by telephone to identify potential technological barriers and to determine which technology resources are accessible to the family. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate.

The PHA will conduct remote briefings via a video conferencing platform when available. If applicants are unable to adequately access the video conferencing platform, the briefing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in, the remote briefing will be postponed, and an in-person alternative or one-on-one briefing over the phone will be provided.

The PHA will provide login information and/or conferencing call-in information and an electronic copy of the briefing packet via email before the briefing. The PHA will provide a paper copy of the briefing packet upon family request and may reschedule the briefing to allow adequate time for the family to receive the physical briefing packet.

The PHA will ensure that all electronic information stored or transmitted as part of the briefing meets the requirements for accessibility for persons with disabilities and persons with LEP, and is secure, including ensuring personally identifiable information (PII) is protected.

The PHA will ensure that families who participate in remote briefings have the opportunity to ask questions as part of the briefing.

If families lose connectivity during any remote briefing or otherwise feel they were unable to access information presented during the briefing, the family may request a one-on-one briefing over the phone or in person with the PHA.

Oral Briefing [24 CFR 982.301(a)]

Each briefing will provide information on the following subjects:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside the PHA's jurisdiction;
- An explanation of how portability works. The PHA may not discourage the family from choosing to live anywhere in the PHA jurisdiction or outside the PHA jurisdiction under portability, unless otherwise expressly authorized by statute, regulation, PIH Notice, or

court order;

- The PHA must inform the family of how portability may affect the family's assistance through screening, subsidy standards, payment standards, and any other elements of the portability process which may affect the family's assistance;
- The advantages of areas that do not have a high concentration of low-income families; and
- For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance.

In briefing a family that includes a person with disabilities, PHA must also take steps to ensure effective communication.

Encouraging Participation in Areas of Low Poverty Rates or Low Minority Concentration

At the briefing families are encouraged to search for housing in areas with low poverty rates and the HACSD will provide assistance to families who wish to do so.

The assistance provided to such families includes:

- Direct contact with landlords
- Providing information about services in various non-impacted areas
- Meeting with neighborhood groups to promote understanding
- Formal or informal discussions with landlord groups
- Formal or informal discussions with social service agencies
- Meeting with rental referral companies or agencies
- Meeting with fair housing groups or agencies

Briefing Packet [24 CFR 982.301(b); New HCV GB, *Housing Search and Leasing*, p. 7]

Documents and information provided in the briefing packet must include the following:

- The term of the voucher, voucher suspensions, and the PHA's policies on any extensions of the term. If the PHA allows extensions, the packet must explain how the family can request an extension.
- A description of the method used to calculate the housing assistance payment for a family, including how the PHA determines the payment standard for a family, how the PHA determines total tenant payment for a family, and information on the payment standard and utility allowance schedule.
- An explanation of how the PHA determines the maximum allowable rent for an assisted unit, including the rent reasonableness standard.
- Where the family may lease a unit and an explanation of how portability works, including information on how portability may affect the family's assistance through screening, subsidy standards, payment standards, and any other elements of the portability process that may affect the family's assistance.
- The HUD-required tenancy addendum, which must be included in the lease.
- The Request for Tenancy Approval (RFTA) form, and a description of the procedure

for requesting approval for a tenancy.

- A statement of the HACSD policy on providing information about families to prospective owners.
- The HACSD subsidy standards including when and how exceptions are made, and how the voucher size relates to the unit size selected.
- Materials on how to select a unit and any additional information on selecting a unit that HUD provides (e.g. HUD brochure entitled, “A Good Place to Live”).
- Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form, including information on how to complete the form and file a fair housing complaint. Additionally, the pamphlet, “*Fair Housing: It’s Your Right*,” and the phone numbers of the local fair housing agency and the HUD enforcement office.
- Information on the availability of lists of landlords or other parties willing to lease to assisted families, or agencies that help in the search for units. The list may include, if available, those willing to lease units, or agencies able to help families find units outside areas of poverty or minority concentration.
- Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to the PHA.
- The family obligations under the program, including any obligations of a welfare-to-work family, and any obligations of other special programs if the family is participating in one of those programs.
- The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act.
- PHA informal hearing procedures including when the PHA is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing.
- An explanation of the advantages of moving to an area that does not have a high concentration of low-income families.
- The HUD pamphlet on lead-based paint entitled, “Protect Your Family from Lead in Your Home.”

If the PHA is located in a metropolitan area, the following additional information must be included in the briefing packet in order to receive full points under SEMAP Indicator 7, Expanding Housing Opportunities [24 CFR 985.3(g)]:

- Maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within its jurisdiction and its neighboring jurisdiction
- Information about the characteristics of these areas including job opportunities, schools, transportation, and other services
- An explanation of how portability works, including a list of portability contact persons for neighboring PHAs with names, addresses, and telephone numbers

Additional Items to Be Included in the Briefing Packet

In addition to items required by the regulations, PHAs may wish to include supplemental materials to help explain the program to both participants and owners [HCV GB, Notice PIH 2017-12].

HACSD Policy

The PHA will provide the following additional materials in the briefing packet:

A copy of HUD form 903, for how to fill out and file a housing discrimination complaint form

The form HUD-5380 domestic violence certification form and the form

HUD-5382 notice of occupancy rights, which contains information on VAWA protections for victims of domestic violence, dating violence, sexual assault, and stalking

An information packet including an explanation of how portability works, and a list of the names, addresses, and contact names of neighboring housing agencies.

A map or description of areas representing various income levels of the jurisdiction and surrounding areas for the purpose of expanding housing opportunities for families.

Information regarding the HACSD's outreach program for families who are interested in, or experiencing difficulty in, obtaining housing in areas outside of minority-concentrated locations.

A list of properties or property management organizations that own or operate housing units outside areas of poverty or minority concentration.

Sample leases for owners who do not use a lease for their unassisted tenants.

Family Handbook with Family Handbook receipt.

The family's rights as a tenant and a program participant.

Requirements for reporting changes between annual recertifications.

A copy of the briefing presentation slides.

5-I.C. FAMILY OBLIGATIONS

Obligations of the family are described in the housing choice voucher (HCV) regulations and on the voucher itself. These obligations include responsibilities the family is required to fulfill, as well as prohibited actions. The PHA must inform families of these obligations during the oral briefing, and the same information must be included in the briefing packet. When the family's unit is approved and the HAP contract is executed, the family must meet those obligations in order to continue participating in the program. Violation of any family obligation may result in termination of assistance, as described in Chapter 12.

Time Frames for Reporting Changes Required by Family Obligations

HACSD Policy

Unless otherwise noted below, when family obligations require the family to respond to a request or notify the PHA of a change, notifying the PHA of the request or change within 14 calendar days is considered prompt notice.

When a family is required to provide notice to the PHA, the notice must be in writing.

Family Obligations [24 CFR 982.551]

HACSD Policy

Appointments

In the administration of the programs, families are required to be available for various reasons including eligibility interview, program review conferences, inspection appointments, or overpayment conferences. Families scheduled for an appointment must attend that

appointment or call to reschedule the appointment. The family will generally receive two appointment opportunities.

If the family fails to attend a scheduled appointment and fails to reschedule, the HACSD may either:

- Reschedule the appointment one final time; or
- Send a notification of termination of assistance and information about the opportunity for an informal hearing.

Persons with a disability connected need who are unable to come to the HACSD office will be granted an accommodation by conducting the interview at the person's home or by telephone. The family obligations of the voucher are listed as follows:

- The family must supply any information that the PHA or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- The family is responsible for any Housing Quality Standards (HQS) breach by the family caused by failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond normal wear and tear caused by any member of the household or guest.

HACSD Policy

Damages beyond normal wear and tear will be considered to be damages which could be assessed against the security deposit.

The family must allow the HACSD to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan. The family must allow the owner access to the premises to make repairs after reasonable notice was given.

- The family must not commit any serious or repeated violation of the lease.

HACSD Policy

The HACSD will determine if the family has committed repeated/serious violations of the lease based on available evidence including, but not limited to, court-ordered eviction, an owner's notice to evict, or witness statements.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, criminal activity, or living or housekeeping habits that cause damage to the unit or premises or repeated or continual failure to maintain the premises in a healthy, safe, and sanitary condition.

Generally, the criterion to be used will be whether the reason for the eviction was the fault of the tenant or guests. Any incidents of, or criminal activity related to, domestic violence, dating

violence, sexual assault, or stalking will not be construed as serious or repeated lease violations by the victim [24 CFR 5.2005(c)(1)].

- The family must notify the PHA and the owner before moving out of the unit or terminating the lease.

HACSD Policy

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to the PHA at the same time the owner is notified.

- The family must promptly give the PHA a copy of any owner eviction notice.
- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

HACSD Policy

The HACSD must approve the composition of the assisted family residing in the unit. The family must promptly inform the HACSD of the birth, marriage or registered domestic partnership, adoption, return of a disabled or minor child to the family, court-awarded custody of a child, or addition of an elderly or disabled dependent adult. The family must request prior HACSD approval to add any other family member as an occupant of the unit. The request to add a family member must be submitted in writing and approved **prior** to the person(s) moving into the unit.

The HACSD will determine eligibility of the new member in accordance with the policies in Chapter 3.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- If the HACSD has given approval, a foster child or a live-in aide may reside in the unit. If the family does not request approval or the HACSD approval is rescinded or denied, the family may not allow a foster child or live-in aide to reside with the assisted family. The PHA has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied. For policies related to the request and approval/disapproval of foster children, foster adults, and live-in aides, see Chapter 3 (sections I.K and I.M), and Chapter 11 (section II.B).
- The family must not sublease the unit, assign the lease, or transfer the unit.

HACSD Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information or certification requested by the HACSD to verify that the family is living in the unit, or to document a family absence from the unit. The family must cooperate with the HACSD for this purpose.

- The family must promptly notify the PHA when the family is absent from the unit.

HACSD Policy

The family must promptly notify the HACSD when the family is expected to be absent from the unit more than 14 days. The family must notify the HACSD prior to moving from the unit.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, whether or not a family member, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space, or a Section 8 Homeownership Program participant).
- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).
- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.
- The household must notify the HACSD in writing within 14 days of occurrence if any family member is arrested for any drug related criminal activity, violent criminal activity, or other criminal activity on or near the premises even if the arrest does not result in a conviction.
- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for a discussion of HUD and PHA policies related to alcohol abuse.
- An assisted family or member of the family must not receive Section 8 HCV tenant-based program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- For PHA's that have a Section 8 welfare-to-work program, assistance will be terminated if the family has failed to fulfill its obligation under that program. The HACSD does not currently have a welfare-to-work voucher program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the HACSD has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]
- Members of the household may engage in legal profit-making activities in the unit, but only if such activities are incidental to the primary use of the unit as a residence by members of the family, do not cause damage or a nuisance, and the property owner has given permission for such activities. If the HACSD determines that the use of the unit as a business is not incidental to its use as a dwelling unit, it will be

considered a program violation. If the owner legally disallows the profit-making activity in the unit, it will be considered a program violation. If the HACSD determines the business is not legal, it will be considered a program violation.

HACSD Policy

After the Briefing and Before Lease-Up

Change in Total Tenant Payment (TTP) Prior to HAP Effective Date

Income Decrease

When the family properly reports changes in factors that will reduce the total family share prior to the effective date of the HAP contract at admission, the information will be verified and the reduction in family share will be recalculated. Prior to submission of the Request For Tenancy Approval (RFTA), the intake unit will calculate the reduction in family income. After submission of the RFTA, case management will calculate the reduction in family income. However, the processing of the RFTA will not be delayed in order to calculate a family's income decrease. In some cases, the income decrease will be processed with an interim as soon as possible after the execution of the lease and contract.

Income Increase

All family increases in income will be calculated. Prior to submission of the RFTA, the intake unit will calculate the increase in family income. After submission of the RFTA, case management will calculate the increase in family income. However, the processing of the RFTA will not be delayed to calculate the income increase. In some cases, the income increase will be processed with an interim as soon as possible after the execution of the lease and contract.

Additions to the Family

Additions to the household received after prescreening will not be permitted until the family has been assisted for at least 12 months in accordance with the HACSD's interim policy, unless the additions are due to birth, marriage or registered domestic partnership, adoption, court-awarded custody, return of minor or disabled children, or elderly or disabled dependents to the household.

Family Reporting Requirements

Families must report changes in income, assets, and family composition within 14 days of the change. Families discovered to have provided false, misleading, incomplete, or untrue information prior to execution of a HAP contract in order to be found eligible for assistance will have their vouchers rescinded and will not be eligible for return to the waiting list at original date/time of application.

PART II: SUBSIDY STANDARDS AND VOUCHER ISSUANCE

5-II.A. OVERVIEW

The PHA must establish subsidy standards that determine the number of bedrooms needed for families of different sizes and compositions. This part presents the policies that will be used to determine the family unit size (also known as the voucher size) a particular family should receive, and the policies that govern making exceptions to those standards. The PHA must also establish policies related to the issuance of the voucher, to the voucher term, and to any extensions of the voucher term.

5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

The following requirements apply when the PHA determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the housing quality standards.
- The subsidy standards must be applied consistently for all families of like size and composition.
- A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.
- A family that consists of a pregnant woman (with no other persons) must be treated as a two-person family.
- Any live-in aide (approved by the PHA to reside in the unit to care for a family member who is disabled or is at least 50 years of age) must be counted in determining the family unit size;
- Unless a live-in-aide resides with a family, the family unit size for any family consisting of a single person must be either a zero- or one-bedroom unit, as determined under the PHA subsidy standards.

HACSD Policy

The HACSD may take the administrative action at any time, if warranted by HUD funding limitations and/or reductions, to reduce its subsidy standards to two people per bedroom and living area with no exceptions. The HACSD may take the administrative action at any time to increase its subsidy standards, if HUD and funding allows and if necessary, to improve or maintain the viability of the program.

The HACSD may change its subsidy standards at any time without prior notice to its participants should the circumstances warrant it, such as in the case of funding reductions. The voucher size is determined prior to the briefing by comparing the family composition to the HACSD subsidy standards.

The applicable subsidy standards relate to the number of bedrooms on the voucher, not the family's actual living arrangements. After initial voucher issuance, the voucher size may be increased or decreased in accordance with the HACSD's policies.

Generally, upon voucher issuance to new program admissions and incoming ports, the HACSD will issue a voucher within the following guidelines:

Voucher Size	Persons in the Household (Minimum — Maximum)
0 Bedroom	1-1
1 Bedroom	1-2
2 Bedroom	2-4
3 Bedroom	4-6
4 Bedroom	6-8
5 Bedroom	8-10
6 Bedroom	10-12

Subsidy Standards

One bedroom is assigned for the head of household/spouse or head of household/co-head and one bedroom is awarded to each additional two household members, including permanent foster children/adults, regardless of sex, age, or relationship. A live-in aide is entitled to a separate bedroom.

Current participants who were issued a voucher based on the previous subsidy standard of one bedroom assigned to each two household members, including permanent foster children/adults, regardless of sex, age or relationship will be issued a notice if their voucher unit size will be increased under the new subsidy standards. For these participants, the new subsidy standards will become effective on the earliest of the following:

- Family moves to a different unit;
- Change in participant family size or as otherwise described in Increase/Decrease in Voucher Unit Size sections below;
- At the first annual recertification.

Permanent foster children/adults are defined as those expecting to reside with the family for at least one year.

No additional voucher bedrooms are provided for a live-in aide's family. A family member may have only one live-in aide.

Space will not be provided for a family member, other than a spouse, who will be absent most of the time, such as a member absent due to military service.

A pregnant woman (with no other persons) must be treated as a two-person family.

For incoming portability, the above standards apply to family members listed on the HUD-50058. Any additional family members to be added to those listed on the HUD-50058 will require HACSD approval and are subject to the limitations to household additions applied to program participants.

For Project-Based Voucher (PBV) developments, the HACSD may establish different subsidy standards to meet the needs of a particular population or project. More information regarding specific application of subsidy standards to PBV can be found in Chapter 17 of the Plan.

Increases in Voucher Unit Size for Participants

The payment standards policy referenced in Chapter 11 of this Plan states that if there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards, the new family unit size must be used to determine the payment standard amount for the family at the family's *first annual* reexamination following the change in family unit size. The effective date of subsidy standards changes generally aligns with the payment standards policy. A family's payment standard cannot be updated at interim reexamination unless otherwise authorized by HUD.

Changes to the Subsidy Standards will only be applied at interim during any applicable payment standards waiver period, otherwise it will be applied at annual recertification.

The HACSD may increase the voucher size upon the approval of additional household members including permanent foster children/adults, the addition of a live-in aide, or as a reasonable accommodation for a person with disabilities. Generally, an increase in the unit size will be applied beginning on the effective date of the family's first annual reexamination that is being processed after the effective date of the unit size increase.

Decreases in Voucher Unit Size for Participants

The HACSD will not reduce the voucher unit size for participants unless there is a change in household composition; the family is no longer entitled to a reasonable accommodation or a live-in aide; the subsidy standards change; or it is found the current subsidy standards were never applied or were applied in error. A reduction in voucher size will be applied at the next family annual recertification, or as soon as possible thereafter. The family must receive at least a 60-day advance notification of a reduction in voucher size.

5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS

In determining family unit size for a particular family, the PHA may grant an exception to its established subsidy standards, upon request, if the PHA determines that the exception is justified by the age, sex, health, handicap, or relationship of family members or other personal circumstances [24 CFR 982.402(b)(8)].

For a single person who is not elderly, disabled, or a remaining family member, an exception cannot override the regulatory limit of a zero or one bedroom [24 CFR 982.402(b)(8)].

HACSD Policy

On a case-by-case basis, HACSD will consider granting an exception to its established subsidy standards for documented health and safety reasons.

Request for Exceptions to Subsidy Standards

The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger voucher size and must include appropriate documentation. Requests based on health and safety reasons must be verified by a knowledgeable professional source.

The HACSD will require only the information necessary to determine the needs that warrant an additional bedroom. HACSD will notify the family of its determination after documentation of necessary information is received.

Reasonable accommodation requests for persons with disabilities will be considered in accordance with the policy outlined in Chapter 2 of this Plan.

5-II.D. VOUCHER ISSUANCE [24 CFR 982.302]

When a family is selected from the waiting list (or as a special admission as described in Chapter 4), or when a participant family wants to move to another unit, the PHA issues a Housing Choice Voucher, form HUD-52646. This chapter deals only with voucher issuance for applicants. For voucher issuance associated with moves of program participants, please refer to Chapter 10.

The voucher is the family's authorization to search for housing. It specifies the unit size for which the family qualifies and includes both the date of voucher issuance and date of expiration. It contains a brief description of how the program works and explains the family obligations under the program. The voucher is evidence that the PHA has determined the family to be eligible for the program, and that the PHA expects to have money available to subsidize the family if the family finds an approvable unit. However, the PHA does not have any liability to any party by the issuance of the voucher, and the voucher does not give the family any right to participate in the PHA's housing choice voucher program [Voucher, form HUD-52646].

A voucher can be issued to an applicant family only after the PHA has determined that the family is eligible for the program based on verification of information received within the 60 days prior to issuance [24 CFR 982.201(e)] and after the family has attended an oral briefing [HCV GB].

HACSD Policy

During the briefing session or upon approval of participant's transfer of unit, a household will be issued a Housing Choice Voucher (HCV) form HUD-52646. The voucher represents a contractual agreement between the HACSD and the family specifying the rights and responsibilities of each party.

The PHA should have sufficient funds to house an applicant before issuing a voucher. If funds are insufficient to house the family at the top of the waiting list, the PHA must wait until it has adequate funds before it calls another family from the list [HCV GB].

HACSD Policy

Prior to issuing any vouchers, the PHA will determine if it has sufficient funding in accordance with the policies in Part VIII of Chapter 16. If the HACSD determines there is insufficient funding after a voucher to an applicant is issued, the PHA may rescind the voucher and place the affected family back on the waiting list.

5-II.E. VOUCHER TERM AND EXTENSIONS

Voucher Term [24 CFR 982.303]

The initial term of a voucher must be at least 60 calendar days. The initial term must be stated on the voucher [24 CFR 982.303(a)].

HACSD Policy

The initial voucher term will be at least 60 calendar days.

The voucher is valid for the period of time specified on the voucher. The family must submit a Request for Tenancy Approval (RFTA) prior to the expiration of the voucher term.

Extensions of Voucher Term [24 CFR 982.303(b)]

The PHA has the authority to grant extensions of search time, to specify the length of an extension, and to determine the circumstances under which extensions will be granted. There is no limit on the number of extensions that the PHA can approve. Discretionary policies related to extension and expiration of search time must be described in the PHA's administrative plan [24 CFR 982.54].

PHAs must approve additional search time if needed as a reasonable accommodation to make the program accessible to and usable by a person with disabilities. The extension period must be reasonable for the purpose.

The family must be notified in writing of the PHA's decision to approve or deny an extension. The PHA's decision to deny a request for an extension of the voucher term is not subject to informal review [24 CFR 982.554(c)(4)].

HACSD Policy

An extension may or may not be granted, depending on current departmental policy. If the HACSD is allowing extensions, a family must request an extension to the initial term of the voucher in writing prior to voucher expiration. Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.

The HACSD must be satisfied that the family has made a reasonable effort to locate a unit, including seeking the assistance of the HACSD, throughout the initial voucher term. A written family search record may be required.

An extension may be granted beyond 180 days if a family has a need for reasonable accommodation for a household member with a disability.

After the first 30 days of the search, a search record may be required for any voucher extension requests. The search record must include a list of the units visited. This list must include the dates the units were examined, the landlords' names and telephone numbers, the unit addresses, the rents, and why the voucher holder was not able to rent the unit.

The PHA may approve additional extensions upon written request from the family as authorized by the appointing authority. The PHA will provide notification to the family of any decision to approve or deny a request for an extension.

Suspensions of Voucher Term [24 CFR 982.303(c)]

The PHA must provide for suspension of the initial or any extended term of the voucher from the date the family submits a request for tenancy approval (RFTA) until the date the PHA notifies the family in writing whether the request has been approved or denied. When a RFTA is received, the PHA will add the number of days taken to process the RFTA to the term of the voucher. This is called "tolling."

Expiration of Voucher Term

Once a family's housing choice voucher term (including any extensions) expires, the family is no longer eligible to search for housing under the program. If the family still wishes to receive assistance, the PHA may require that the family reapply, or may place the family on the waiting list with a new application date but without requiring reapplication. Such a family does not become ineligible for the program on the grounds that it was unable to locate a unit before the voucher expired [HCV GB].

HACSD Policy

If an applicant family's voucher term or extension expires before the HACSD has approved a tenancy, and an extension is not granted, the HACSD will require the family to reapply for assistance. The family is not entitled to a review or hearing.

Upon the expiration of the voucher term or any extension, the PHA will notify the family in writing that the voucher term has expired, and the family must reapply to be placed on the waiting list.

Chapter 6 - INCOME AND SUBSIDY DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 982]

Introduction

A family's income determines eligibility for assistance and is also used to calculate the family's payment and the PHA's subsidy. The PHA will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

Part I: Annual Income. HUD regulations specify the sources of income to include and exclude to arrive at a family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.

Part II: Adjusted Income. Once annual income has been established HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies. These requirements and PHA policies for calculating adjusted income are found in Part II.

Part III: Calculating Family Share and PHA Subsidy. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining PHA subsidy and required family payment.

PART I: ANNUAL INCOME

6-I.A. OVERVIEW

The general regulatory definition of *annual income* shown below is from 24 CFR 5.609.

5.609 Annual income.

(a) Annual income means all amounts, monetary or not, which:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph [5.609(c)].
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Inclusions (Exhibit 6-1)
- Annual Income Exclusions (Exhibit 6-2)
- Treatment of Family Assets (Exhibit 6-3)
- Earned Income Disallowance for Persons with Disabilities (Exhibit 6-4)
- The Effect of Welfare Benefit Reduction (Exhibit 6-5)

Sections 6-I.B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. HUD regulations present income inclusions and exclusions separately [24 CFR 5.609(b) and 24 CFR 5.609(c)]. In this plan, however, the discussions of income inclusions and exclusions are integrated by topic (e.g., all policies affecting earned income are discussed together in section 6-I.D). Verification requirements for annual income are discussed in Chapter 7.

6-I.B. HOUSEHOLD COMPOSITION AND INCOME

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-in aides	Income from all sources is excluded [24 CFR 5.609(c)(5)].
Foster child or foster adult	Income from all sources is excluded [24 CFR 5.609(c)(2)].
Head, spouse, or cohead Other adult family members	All sources of income not specifically excluded by the regulations are included.
Children under 18 years of age	Employment income is excluded [24 CFR 5.609(c)(1)]. All other sources of income, except those specifically excluded by the regulations, are included.
Full-time students 18 years of age or older (not head, spouse, or cohead)	Employment income above \$480/year is excluded [24 CFR 5.609(c)(11)]. All other sources of income, except those specifically excluded by the regulations, are included.

HACSD Policy

For admission, an unborn child is not considered when determining the income limits. For example, a pregnant single person is considered a one-person household when determining the income limits. To determine if the family is income-eligible for admission, the HACSD compares the annual income of the family to the applicable income limit for the family's size. Newly admitted families who exercise portability prior to receiving initial assistance must be within the applicable income limit of the receiving PHAs. This requirement does not include those who had been participants with the initial PHA.

Kin-GAP Income

California Kinship Guardian Assistance Payments (Kin-GAP) income is excluded from the family's annual income [PIH Notice 2012-1]. These children are considered regular family members and not foster children.

Temporarily Absent Family Members

The income of family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit [HCV GB].

HACSD Policy

The HACSD must count all applicable income of every family member who is on the lease, including those who are temporarily absent. In addition, the HACSD must count the income of the spouse, co-head or the head of household, if that person is temporarily absent, even if that person is not on the lease. The income of a permanently absent spouse who was previously in the assisted household will be counted unless the family has filed for a divorce or legal separation.

Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

HACSD Policy

Full-time students who attend school away from the home will be treated in the following manner:

A student (other than head of household, spouse or co-head) who attends school away from home, but lives with the family during school recesses may, depending on the circumstances, be considered either temporarily or permanently absent. If the family member is considered permanently absent, income of that member will not be included in total household income, the member will not be included on the lease, and the member will not be included for determination of voucher size.

Students who are out of the home more than 50 percent of the year are considered permanently absent, unless they are in boarding school, school dormitories, or temporarily staying with family or friends without a lease or rental agreement.

Absences Due to Placement in Foster Care

Children temporarily absent from the home as a result of placement in foster care are considered members of the family [24 CFR 5.403].

HACSD Policy

The HACSD will verify with the appropriate agency when a child or children, temporarily absent from the home due to placement in foster care will return.

If the children have been removed permanently, the voucher size will be reviewed and reduced, if appropriate.

Absent Head, Spouse, or Cohead

HACSD Policy

Income of persons permanently absent, except a spouse who is not legally separated, will not be counted. If the spouse is temporarily absent and, in the military, all military pay and allowances (except hazardous duty pay when exposed to hostile fire and any other HUD-defined exceptions to military pay) are counted as income.

It is the responsibility of the head of household to report changes in family composition.

Absence of Any Member

HACSD Policy

A member of the household is considered permanently absent if the household member is away from the unit for six consecutive months or more in a 12-month period, except as otherwise provided in this Chapter. A sole member is considered permanently absent if absent from the unit for 30 consecutive days. A sole member may be granted an extension of up to 180 consecutive days for medical reasons, as a reasonable accommodation for a disability, or a family emergency.

If a member of the household is subject to a court order that restricts him/her from the home for more than six months, the person will be considered permanently absent.

Family Members Permanently Confined for Medical Reasons

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB].

HACSD Policy

If a family member leaves the household to enter a facility such as a hospital, nursing home, or rehabilitation center, the HACSD will require verification from a reliable, qualified source as to the likelihood of their return, and the anticipated length of their absence.

If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or cohead qualifies as an elderly person or a person with disabilities.

Joint Custody of Dependents

HACSD Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family if they live with the applicant or participant family 50 percent or more of the time.

In cases where there is no court-awarded custody of a minor child or children due to the absence of the parent or legal guardian of the child and the child is living with the assisted family, the HACSD will apply the preponderance of evidence standard to determine if the family has physical custody of the minor child or children. The HACSD will accept documentation including, but not limited to, school records, public assistance payments and notarized sworn statements that demonstrate that the assisted family has actual physical custody of the minor child or children.

Preponderance of evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not.

Caretakers for a Child

HACSD Policy

The approval of a caretaker is at the owner and PHA's discretion and subject to the owner and PHA's screening criteria. If neither a parent nor a designated guardian remains in a household receiving HCV assistance, the PHA will take the following actions.

- (1) When the courts or a social service agency have determined that another adult is to be brought into the assisted unit to care for the children for an indefinite period, in instances when the parents have vacated, the HACSD will treat that adult as a visitor for the first 180 days. During the time the caretaker is considered a visitor, the caretaker's income will not be counted, nor deductions allowed.
- (2) After 180 days, if the court awards custody or legal guardianship to the caretaker, the voucher will be transferred to the caretaker, providing the caretaker meets all eligibility criteria for household additions. At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.
- (3) If there is court action to award custody of legal guardianship to the caretaker, the voucher will be transferred to the caretaker, providing the caretaker meets all eligibility criteria for household additions.

- (4) The HACSD will transfer the voucher to the caretaker, in the absence of a court order, if the caretaker has been in the unit for more than 12 months, and it is reasonable to expect custody to be granted.
- (5) If custody is awarded for a limited time, the HACSD will state in writing that the transfer of the voucher is for a limited time, according to the period the caretaker has custody of the children.
- (6) Once the caretaker is approved by the HACSD and no longer considered a visitor, the income of the caretaker will be counted and deductions will be allowed.

A legal parent who able to assume the responsibilities of the head of household may be added to the household and is not considered a visitor. Income and deductions are considered. See Chapter 3-I.C.

6-I.C. ANTICIPATING ANNUAL INCOME

The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.

Gross income is the amount of income prior to any HUD allowable expenses or deductions or state and local taxes and deductions and does not include income excluded by HUD. Annual income is used to determine whether applicants are within the applicable income limits. Wages for full-time employment are anticipated for a full 52 weeks, unless documentation is provided that wages will not be earned for the full year.

Basis of Annual Income Projection

The PHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the PHA to use other than current circumstances to anticipate income when:

- An imminent change in circumstances is expected [HCV GB]
- It is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income) [24 CFR 5.609(d)]
- The PHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]

PHAs are required to use HUD’s Enterprise Income Verification (EIV) system in its entirety as a third-party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].

HUD allows PHAs to use tenant-provided documents (pay stubs) to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the PHA does not determine it is necessary to obtain additional third-party data.

HACSD Policy

When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant-provided documents to project annual income. When the tenant- provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last 60 days.

The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:

If EIV or other UIV data is not available,

If the family disputes the accuracy of the EIV employer data, and/or

If the PHA determines additional information is needed.

In such cases, the PHA will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.

When the HACSD cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), the PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income. The HACSD will use the most current income data and, if appropriate, historical income data to calculate the anticipated annual income.

Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.

Known Changes in Income

If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.

Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the reexamination. In such a case the PHA would calculate annual income as follows: $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$.

The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then require an interim reexamination when the change actually occurs. This requirement will be imposed even if the PHA's policy on reexaminations does not require interim reexaminations for other types of changes.

When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the reexamination interview date.

Projecting Income

In HUD's EIV webcast of January 2008, HUD made clear that PHAs are not to use EIV quarterly wages to project annual income.

When annual income cannot be anticipated for a full 12 months, the HACSD may use one of the following methods to calculate annual income:

- Average known sources of income that vary to eliminate interim adjustments
- Annualize current income and conduct an interim adjustment when it goes down
- Use prior year's income information to anticipate the following year
- Average employer's year-to-date income information

For regularly received bonuses and/or commissions, the HACSD will verify and then average amounts received for the previous year, unless the family can provide credible documentation indicating the historical information is incorrect.

CalWORKs benefits shall be anticipated by using the current month's benefit, which is then multiplied by 12. The future month's benefit is not considered, as it may change.

The method used depends on the regularity, source and type of income.

6-I.D. EARNED INCOME

Types of Earned Income Included in Annual Income

Wages and Related Compensation

The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services is included in annual income [24 CFR 5.609(b)(1)].

HACSD Policy

For regularly received bonuses and/or commission, the HACSD will verify and average amounts received for one-year preceding admission or reexamination, unless the family can provide credible documentation indicating the historical information is incorrect.

Some Types of Military Pay

All regular pay, special pay and allowances of a member of the Armed Forces are counted [24 CFR 5.609(b)(8)] *except* for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(c)(7)].

HACSD Policy

Income Types the HACSD has Determined do not Meet the Definition of Income

Employer Reimbursement of Mileage Expenses

Employer reimbursement for mileage expenses for use of a personal vehicle is not considered income as long as the reimbursement is reasonable as compared to the Internal Revenue Service (IRS) mileage rate. Mileage logs may be required. The amount of the mileage reimbursement that exceeds the standard rate will be counted as income.

Loans

Loans to a participant/applicant from an institution are not considered income. However, "loans" from private parties are considered income if it is apparent there is little likelihood the loan will be repaid within the next three years; loans from the previous year have not been repaid; and if there was no written, well-defined notarized loan repayment agreement executed at the time the "loan" began.

Repayment of a loan back to the applicant/participant is not considered income if documentation can be presented that the loan was made by the applicant/participant to the person repaying the loan. If no documentation is provided, the "repayments" are considered income. Repayments back of a loan made by the assisted household must be documented as follows in order to not count the payments as regular contributions to the family:

Bank statement withdrawals indicating the assisted household made the loan.

Cancelled checks indicating the amount of the loan and to whom the loan was paid.

Notarized loan repayment agreement executed around the time the loan was made, with the terms and amount of the loan.

Employer Contributions to a Flexible Spending Account

Employer contributions to a flexible medical or childcare expense account are not considered income as long as the money is only accessible to the family as reimbursement for out-of-pocket medical or childcare expenses. However, childcare or medical expenses will not be allowed as a deduction if they are reimbursable through a flexible employer contribution account.

Documentation regarding the requirements of the account may be required.

Types of Earned Income Not Counted in Annual Income

Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(c)(9)]

This type of income (including gifts) is not included in annual income. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 days [Notice PIH 2009-19].

HACSD Policy

Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic **if** future work could not be anticipated **and** no historic, stable pattern of income existed. Another example of sporadic income may be winnings from a lottery.

Children's Earnings

Employment income earned by children (including foster children) under the age of 18 years is not included in annual income [24 CFR 5.609(c)(1)]. (See Eligibility chapter for a definition of *foster children*.)

Certain Earned Income of Full-Time Students

Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, or cohead) are not counted [24 CFR 5.609(c)(11)]. To be considered "full-time," a student must be considered "full-time" by an educational institution with a degree or certificate program [HCV GB]. All earned income of the head, spouse, or co-head full- or part-time student is included in annual income. School expenses, including mileage, are not allowable deductions.

Income of a Live-in Aide

Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(c)(5)]. (See Eligibility chapter for a full discussion of live-in aides.)

Income Earned under Certain Federal Programs

Income from some federal programs is specifically excluded from consideration as income [24 CFR 5.609(c)(17)], including:

- Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
- Awards under the federal work-study program (20 U.S.C. 1087 uu)
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- Allowances, earnings, and payments to participants in programs funded under the Workforce

Investment Act of 1998 (29 U.S.C. 2931)

Resident Service Stipend

Amounts received under a resident service stipend are not included in annual income. A resident service stipend is a modest amount (not to exceed \$200 per individual per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time [24 CFR 5.600(c)(8)(iv)].

State and Local Employment Training Programs

Incremental earnings and benefits to any family member resulting from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program [24 CFR 5.609(c)(8)(v)].

HACSD Policy

The HACSD defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual's ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].

The HACSD defines *incremental earnings and benefits* as the difference between: (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program, and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].

Documentation to verify these exclusions includes third-party verification or documentation describing the program and the funding source.

Pre-enrollment income will be the income received prior to receipt of income from the training program.

HUD-Funded Training Programs

Amounts received under training programs funded in whole or in part by HUD [24 CFR 5.609(c)(8)(i)] are excluded from annual income. Eligible sources of funding for the training include operating subsidy, Section 8 administrative fees, and modernization, Community Development Block Grant (CDBG), HOME program, and other grant funds received from HUD.

HACSD Policy

To qualify as a training program, the program must meet the definition of training program provided above for state and local employment training programs.

Earned Income Tax Credit

Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26

U.S.C. 32(j)), are excluded from annual income [24 CFR 5.609(c)(17)]. Although many families receive the EITC annually when they file taxes, an EITC can also be received throughout the year. The prorated share of the annual EITC is included in the employee's payroll check.

6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES

[24 CFR 5.617; Streamlining Final Rule (SFR) Federal Register 3/8/16]

The earned income disallowance (EID) encourages people with disabilities to enter the work force by not including the full value of increases in earned income for a period of time. The full text of 24 CFR 5.617 is included as Exhibit 6-4 at the end of this chapter. Eligibility criteria and limitations on the disallowance are summarized below.

Enrollment for eligible families for the Earned Income Disallowance (EID) for persons with disabilities will sunset effective 12/31/2023. Families enrolled prior to this date or who are already enrolled are entitled to receive the full benefit of their 24-month exclusion period. Because EID lasts up to 24 consecutive months, no families will still receive the EID benefit after December 31, 2025. [PIH 2023-27]

Eligibility

This benefit is allowed once per family member in a lifetime. This disallowance applies only to individuals in families already participating in the following programs: HOME Investment Partnerships Program, Housing Opportunities for Persons with AIDS, Supportive Housing Program, and the Housing Choice Voucher Program (not at initial examination). The earned income disallowance is only applied to determine the annual income of family members with disabilities in families who are participants in the Housing Choice Voucher Program and, therefore, does not apply for purposes of admission to the program (including the determination of income eligibility or any income targeting that may be applicable).

To qualify, the family must experience an increase in annual income that is the result of one of the following events:

- Employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment. *Previously unemployed* includes a person who annually has earned no more than the equivalent earnings for working 10 hours per week for 50 weeks at the minimum wage. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.
- Increased earnings by a family member who is a person with disabilities and whose earnings increase during participation in an economic self-sufficiency or job-training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].

Such programs may include job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, or any other program necessary to ready a participant to work (such as substance abuse or mental health treatment).

Qualifying increases are any earned income increases of a family member who is a person with disabilities during participation in an economic self-sufficiency or job-training program, and not increases that occur after participation, unless the training provides assistance, training or mentoring after employment.

- New employment or increased earnings by a family member who is a person with disabilities and who has received benefits or services under Temporary Assistance for Needy Families (TANF) or any other state program funded under Part A of Title IV of the Social Security Act

within the past six months. The amount of TANF received in the six-month period includes monthly income and such benefits and services as one-time payments, wage subsidies and transportation assistance.

If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least \$500.

Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with their "baseline income." The family member's baseline income is their income immediately prior to qualifying for the EID. The family member's baseline income remains constant throughout the period that they are participating in the EID.

Calculation Method

Initial 12-Month Exclusion

During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.

HACSD Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion

During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.

HACSD Policy

During the second 12-month exclusion period, the HACSD will exclude 50 percent of any increase in income attributable to new employment or increased earnings.

Lifetime Limitation

The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they begin to receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance.

6-I.F. BUSINESS INCOME [24 CFR 5.609(b)(2)]

Annual income includes "the net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service (IRS) regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family" [24 CFR 5.609(b)(2)].

Business Expenses

Net income is "gross income less business expense" [HCV GB].

HACSD Policy

To determine business expenses that may be deducted from gross income, the HACSD will use current applicable IRS rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described below.

Business Expansion

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

HACSD Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

HACSD Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. The HACSD will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

HACSD Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of an assisted family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid. Investments do not include the value of labor contributed to the business without compensation.

Co-owned Businesses

HACSD Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

6-I.G. ASSETS [24 CFR 5.609(b)(3); 24 CFR 5.603(b)]

Overview

There is no asset limitation for participation in the HCV program. However, HUD requires that the PHA include in annual income the anticipated “interest, dividends, and other net income of any kind from real or personal property” [24 CFR 5.609(b)(3)]. This section discusses how the income from various types of assets is determined. For most types of assets, the PHA must determine the value of the asset in order to compute income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)] and Exhibit 6-3 provides the regulatory definition of *net family assets*. This section begins with a discussion of general policies related to assets and then provides HUD rules and PHA policies related to each type of asset.

Optional policies for family self-certification of assets are found in Chapter 7.

General Policies

Income from Assets

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the PHA to use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected (2) it is not feasible to anticipate a level of income over 12 months or

the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income, but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant.

HACSD Policy

Each time current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to the HACSD to show why the asset income determination does not represent the family's anticipated asset income.

Valuing Assets

The calculation of asset income sometimes requires the PHA to make a distinction between an asset's market value and its cash value.

- The market value of an asset is its worth in the market (e.g., the amount a buyer would pay for real estate or the total value of an investment account).
- The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash.

HACSD Policy

Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions [HCV GB].

Lump-Sum Receipts

Payments that are received in a single lump sum, such as inheritances, capital gains, lottery winnings, insurance settlements, and proceeds from the sale of property, are generally considered assets, not income. However, such lump-sum receipts are counted as assets only if they are retained by a family in a form recognizable as an asset (e.g., deposited in a savings or checking account) [RHIIP FAQs]. (For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.)

Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29]

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by an average passbook savings rate as determined by the PHA.

- The PHA must review its passbook rate annually to ensure that it remains within 0.75 percent of the national average.

HACSD Policy

The HACSD will initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).

The HACSD will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.

Determining Actual Anticipated Income from Assets

It may or may not be necessary for the PHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property's market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.

Withdrawal of Cash or Liquidation of Investments

Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement investment plan is not counted as income until the family has received payments equal to the amount the family member deposited into the retirement investment plan.

Jointly Owned Assets

The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes "amounts derived (during the 12-month period) from assets to which any member of the family has access."

HACSD Policy

If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset. A family member has unrestricted access to an asset when he or she can legally dispose of the asset without the consent of any of the other owners.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset

A birth certificate is not an acceptable verification of eligible immigration status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept five years.

PHA Verification [HCV GB]

HACSD Policy

Non-citizens with eligible immigration status must sign a declaration of status and verification consent form, with the exception of live-in aides and foster children/adults, and all household members including live-in aides, must provide original immigration documents. Front and back copies are retained and the original immigration documents are returned to the family. The HACSD verifies the eligible immigration status through the USCIS SAVE system. If the initial search fails to verify status, the HACSD will request, within 10 days, that the USCIS conduct a second manual search. If the documents have an expiration date, the applicants/participants must provide either a current document or an USCIS screen print of their current status.

A live-in aide's legal residency will be confirmed through documents. The legal residency of foster children/adults will be verified with the placement agency.

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

Failure to Provide

If an applicant or participant family member fails to sign required declarations and consent forms and/or provide current documents or an USCIS status screen print, as required, s/he must be listed as an ineligible member. If the entire family fails to provide and sign documents as required, the family may be denied or terminated for failure to provide required information. A live-in aide will be prohibited admission to the household to serve as a live-in aide if the live-in aide fails to provide documentation of legal residency.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined placement on the waiting list. [24 CFR 982.207]

HACSD Policy

The following preferences are applicable at the time of selection from the Waitlist.

Residency Preference: This preference applies to families who live, or includes a member who works or has been notified they have been hired to work in the HACSD jurisdiction regardless of length of time.

Acceptable documentation includes two or more of the following documents that indicate the current reported resident or employment address:

Rent receipts, leases, utility bills, employer or agency records, school records, driver's licenses, voter's registration records, credit reports, bank statements, benefits award letter, or statement from household with whom the family is residing. If homeless, a lesser standard of documentation is acceptable.

Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Families with Dependent Children Preference: To be eligible for this preference, the family must provide documentation that there are dependent children in the household or dependent children will be in the household once assistance is approved. A pregnant single person is no different than any other single applicant and is not considered a family with dependent children for admission preference purposes.

In most instances, self-certification is acceptable, unless there is reasonable doubt, in which case the HACSD will ask for further documentation of the placement of the children. This documentation of residence of the children may include:

School records, Court custody documents, leases, welfare agency information, and medical records.

Veterans Preference: This preference is available to active members of the U.S. Armed Forces, veterans (a veteran with a dishonorable discharge does not qualify for this preference), or surviving spouses of veterans.

The HACSD will require U.S. government documents that indicate that the applicant qualifies under the above definition.

Working Preference: This preference is available to families with:

- The Head of household, spouse or sole household member is employed at the time of selection (must have worked an average of at least 20 hours per week for the previous 6 months). Applicants may combine job training and employment preparatory academic program participation as part of the previous 6-month requirement.
- The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits.
- The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207(b)(2)].

Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Disability Preference: This preference is available to families with a head of household or spouse who is a person with disabilities, as defined by HUD.

The HACSD will request appropriate documentation from a knowledgeable health professional. The HACSD will not inquire as to the nature of the disability but will ask a knowledgeable health professional to confirm that the person meets the HUD definition of disability.

Other acceptable documentation of disability is either an award letter, or proof of eligibility for social security disability or supplemental security income.

The HACSD may accept as a reasonable accommodation other credible evidence that the person meets the disability definition.

Elderly Preference: This preference is available to families with a head of household or spouse who is 62 years of age or older.

The HACSD will require appropriate proof of age as verified by submittal of one or more of the following documents: birth certificate, passport, driver's license or resident alien card.

Homeless Preference: The documentation requirement is less stringent for homeless households, given the absence of a permanent residence. A notarized self-certification is required if the homeless household cannot provide documentation of employment/ residence in

the jurisdiction of the HACSD. In addition to the notarized self-certification, documentation must be provided to demonstrate residence in the jurisdiction of the HACSD around the time of selection from the waiting list.

Acceptable documentation includes the following: driver's license, automobile registration, documentation from a San Diego County benefit provider, or receipts from stores, restaurants, motels, etc.

Special Local Preference for Homeless Applicants, Regional Taskforce on the Homeless agency members: The documentation is significantly more stringent for homeless households claiming a special local preference. In addition to the applicable documents listed above, documentation must include:

PHA-approved referral documentation.

Special Local Preference for Non-Elderly Disabled Applicants who are homeless or exiting institutions-HHSA involved: The documentation for non-elderly disabled households claiming this special local preference is detailed in Chapter 18-I. Documentation for exiting an institution includes a certification from a medical provider. Documentation of homeless status is as listed above. In addition, documentation for each preference must include:

PHA approved referral documentation

Special Local Preference for Victims of Domestic Violence in the HACSD's Public Housing:

Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from the HACSD's waiting list because a family member has been determined to be the victim of domestic violence.

Special Local Preference for Families that must be Relocated from the HACSD's Public Housing Unit:

Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from the HACSD's waiting list because the family must be relocated for a significant period of time.

PART III: VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this plan describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

7-III.A. EARNED INCOME

Wages and Tips

HACSD Policy

Verification forms may request the employer specify:

- Dates of employment
- Amount and frequency of earnings
- Date of last pay increase
- Earning history
- Year-to-date earnings
- Expected change in employment status
- Effective date of any anticipated wage increase during next 12 months
- Estimated income from overtime, tips, and bonus pay expected during next 12 months
- Anticipated unpaid time off

Acceptable methods of verification include:

- Employment verification form completed by the employer
- Check stubs or earning statements, which indicate the employee's gross pay, frequency of pay or year-to-date earnings
- W-2 forms or 1099 forms, plus income tax return forms
- Self-certifications or income tax returns signed by the family may be used for verifying self-employment income, or income from tips and other gratuities.

Applicants and program participants may be requested to sign an authorization for release of information from the Internal Revenue Service (IRS) for verification of income, if there is evidence income has not been reported.

In cases with questions about the validity of information provided by the family, the HACSD may require the most recent federal income tax statements or send a referral to the IRS.

Bonuses and/or Commission

For regularly received bonuses and/or commission, the HACSD will verify and average amounts received for one year preceding admission or reexamination, unless the family can provide credible documentation indicating the historical information is incorrect.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

HACSD Policy

In order to verify the net income from self-employment/business ownership, the HACSD will view the IRS federal income tax return, and financial documents from prior years, and use this information to anticipate the income for the next 12 months.

The family **must** provide a copy of its prior year's federal income tax return, if it was filed.

The HACSD may also request documents to support submitted financial statements, such as completed manifests, appointment books, cash journals, or bank statements.

It is the family's responsibility to provide documentation of income and expenses in good order with everything organized, recorded and totaled. The HACSD will reject documentation that has not been organized and totaled; e.g., an unorganized bundle of receipts.

Child Care Business

If an applicant/participant is operating a licensed day care business, income will be verified as for any other type of business.

If the applicant/participant is operating a "cash and carry" operation, which may or may not be licensed, the HACSD may require that the applicant/participant complete a form for each customer. The form must indicate the name of person(s) whose child (children) is/are being cared for, phone number, number of hours the child is being cared for, method of payment (check/cash), amount paid, and signature of person who receives the services.

The family **must** provide a copy of its federal income tax return, if it was filed.

The family must indicate if it is receiving a food allowance or other compensation to offset business expenses. Third-party verification will be requested if another public entity, such as HHSA, is providing compensation to the child care provider.

If none of the above documents is available, the family may provide a notarized self-certification, signed under penalty of perjury, as to gross income received the previous year, as well as anticipated gross income for the next year.

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

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 11.

Social Security/SSI Benefits

To ensure consistency in the determination of annual Social Security and SSI income, PHAs are required to use EIV-reported Social Security and SSI benefit amounts unless the tenant disputes the EIV-reported amount [Notice PIH 2018-24].

HACSD Policy

The HACSD will verify income in the following ranking order:

- EIV Systems
- Benefit notice dated within the last 60 days

To verify the SS/SSI benefits of applicants, the HACSD 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 the

applicant request a benefit verification letter from SSA's Web site at 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 the participant request a benefit verification letter from SSA's website at 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.

If the social security statement indicates a reduced social security benefit due to rounding, the rounded amount shall be counted. If the social security statement indicates a deduction for Medicare, the Medicare payment amount will be added to the net benefit for the countable income.

Other Benefit Income

HACSD Policy

Acceptable methods of verification include:

- Benefit verification form completed by agency providing the benefits
- Award or benefit notification letters prepared and signed by the providing agency
- Computer report electronically obtained or in hard copy
- Pay stubs
- Bank statements that reflect direct deposits

Unemployment Compensation

HACSD Policy

Acceptable methods of verification include:

- Unemployment compensation agency verification form
- Unemployment office computer report e-mailed, faxed, or in hard copy.
- Payment stubs.
- Agency award letter

Regular Contributions and Gifts

HACSD Policy

Regular, non-casual contributions and gifts received from persons outside the assisted household are counted as income. This includes regular contributions from a live-in aide or foster child residing with the family. This includes rent and utility payments made on a regular basis on behalf of the family and other regular cash or non-cash contributions. It does not include casual contributions or sporadic gifts.

A family benefit that is used exclusively by the family, but not titled to the family (i.e., automobile, storage unit), will be counted as in-kind income. The income would include insurance, car

payments, maintenance, and other vehicle expenses that are regularly paid by someone outside of the assisted household.

If an employer provides an automobile that is used for both personal and business purposes, a prorated amount of the vehicle expense payments (insurance, registration, car payments, etc.) will be counted as income. This proration will be based on the percentage of time the vehicle is used for personal purposes. Evidence of a business vehicle used for personal purposes may include the vehicle being stored overnight at the family's residence at least five days a week and the lack of a personal vehicle for that family member.

If the family's expenses exceed its reported income, the HACSD will inquire of the family regarding contributions and gifts.

The family must furnish a self-certification with the following information:

- The person who provides the gifts
- The value of the gifts
- The regularity (dates) of the gifts
- The purpose of the gifts

7-III.D. ALIMONY OR CHILD SUPPORT

HACSD Policy

Regular alimony and child support payments are counted as income. Not generally included in annual income are irregular or lump sum child support payments, as is the case with other irregular or lump sum income.

If the amount of child support or alimony received is less than the amount awarded by the court, the HACSD will use the amount awarded by the court, unless the family can verify it is not receiving the full amount and can demonstrate that an effort was made to collect the amount awarded. Child support or alimony payments in arrears that are being received on a regular basis are included in annual income.

The HACSD will accept verification that the family is receiving an amount less than the award if:

- The family furnishes documentation of a child support or alimony collection action filed through a child support enforcement/collection agency, or
- The family has filed an enforcement or collection action through an attorney.

The HACSD may accept a notarized family certification in writing, under penalty of perjury, that states it is not receiving the full amount of alimony or child support, explains why it cannot provide the documentation outlined in the previous paragraph, and describes a reasonable effort to collect.

It is the family's responsibility to supply a certified copy of the divorce decree.

Acceptable methods of verification for **regular** payments include:

- A copy of a separation, or settlement agreement, or a divorce decree, stating amounts and types of support and payment schedules.
- A signed and dated letter from the person paying the support.
- A copy of latest check and/or payment stubs from court trustee (HACSD must record the date, amount, and number of the check.)

- The family's notarized self-certification of amount received and of the likelihood of support payments being received in the future, or that support payments are not being received.

If payments are *irregular*, the family must provide:

- A copy of the separation, or settlement agreement, or divorce decree, stating the amount, type, and payment schedule of the settlement
- A statement from the agency responsible for enforcing payments to show that the family has filed for enforcement
- A notarized affidavit from the family, signed under penalty of perjury, indicating the amount(s) received
- A welfare notice of action showing amounts received by the welfare agency for child support

7-III.E. ASSETS AND INCOME FROM ASSETS

Assets Disposed of for Less than Fair Market Value

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The PHA needs to verify only those certifications that warrant documentation [HCV GB].

HACSD Policy

The family must sign a declaration form initially and at least annually declaring all assets under the control of the family and those assets disposed for \$10,000 or more under fair market value during the last two years preceding the effective date of the certification or re-certification.

Assets Disposed for Less than Fair Market Value

Assets disposed of as a result of foreclosure or bankruptcy are not considered to be assets disposed for less than fair market value. Assets disposed as a result of a divorce or separation are not considered assets disposed of for less than fair market value, providing some monetary consideration was received and there is a separation or divorce settlement agreement established through arbitration, mediation, or court order.

If the family certifies it has disposed of assets for \$10,000 or more under fair market value, documentation is required that shows: (a) the type of assets disposed of, (b) the date they were disposed of, (c) the amount the family received, and (d) the FMV of the assets at the time of disposition. Third-party verifications will be obtained wherever possible.

Assets to be considered include: real property, savings, stocks, bonds, and other forms of capital investments.

Excluded assets are: the value of personal property such as furniture and automobiles, as well as a trust fund or asset not under the control of any member of the assisted family.

Acceptable Methods of Verification

The HACSD will request third-party verification to determine the current cash value of the family's assets, if the total value of those assets exceeds \$5,000. "Cash value" is the net amount the family would receive if the assets were converted to cash. Assets totaling \$5,000 or less will not be verified with third-party verification each year because of the negligible impact on the HAP amount and family rent, although that asset, as reflected on family provided documentation, will be reflected in the family's asset calculations.

The HACSD will accept a family's declaration of the amount of assets of less than \$5,000, and the amount of income expected to be received from those assets. The application and

reexamination documentation, which is signed by all adult family members, will serve as the declaration. Where the family has net family assets equal to or less than \$5,000, HACSD does not need to request supporting documentation (e.g., bank statements) each year from the family to confirm the assets or the amount of income expected to be received from those assets. The HACSD will obtain third-party documentation of all assets regardless of the amount during the intake process and at least every three years thereafter [24 CFR 982.516(a)(3)(ii)]. Where the family has net family assets in excess of \$5,000, HACSD must obtain supporting documentation (e.g., bank statements) from the family to confirm the assets. Any assets will continue to be reported on HUD Form 50058.

Due to the added administrative cost, the HACSD will not attempt a third-party verification of any asset in which the source collects a service charge and the family has available original documents, such as bank statements. If the family cannot provide original documents, the HACSD will pay the service charge for the third-party verifications.

Acceptable verification may include any of the following:

- Verification forms, letters, or documents from a financial institution or broker
- Passbooks, bank account statements, certificates of deposit, bonds, or financial statements completed by a financial institution or broker
- Quotes from a stockbroker or realty agent as to the net amount family would receive if they liquidated securities or real estate
- Real estate taxes statements, if the approximate current market value can be deduced from assessment
- Financial statements for business assets
- IRS Form 1099 from the financial institution provided that the HACSD must adjust the information to project earnings expected for the next 12 months.
- Closing documents showing the selling price, and the distribution of the sales proceeds
- Appraisals of personal property held as an investment
- Family's self-certification describing assets or cash held at the family's home or in safe deposit boxes

Interest Income from Mortgages or Similar Arrangements

Acceptable methods of verification include:

- A letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next 12 months (A copy of the check paid by the buyer to the family is not sufficient unless a breakdown of interest and principal is shown).
- Amortization schedule showing interest for the 12 months following the effective date of the certification or recertification
- Copies of the deed of trust and note that indicate the beginning principal, interest rate, term of loan, payment schedule, and principal and interest payment.
- Copy of ledger reflecting the posting of payments and application of interest and principal
- Copy of year's end statement to borrower
- Copies of the escrow papers and contract

7-III.F. NET INCOME FROM RENTAL PROPERTY

HACSD Policy

Acceptable methods of verification include:

- IRS Form 1040 with Schedule E (Rental Income)
- Copies of latest rent receipts, leases, or other documentation of rent amounts.
- Documentation of allowable operating expenses of the property including: tax statements, insurance invoices, and bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.
- Lessee's written statement verifying rent payments to the family and family's self-certification as to net income realized.
- Copies of ledgers indicating rent payments.

7-III.G. RETIREMENT ACCOUNTS

HACSD Policy

The PHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.

The type of original document that will be accepted depends upon the family member's retirement status.

Before retirement, the HACSD will use the most current statement from the entity holding the account.

Upon retirement, the HACSD will accept the most current statement from the entity holding the account that reflects any distributions of the account balance, any lump sum withdrawals, and any regular payments.

After retirement, the HACSD will accept the most current statement from the entity holding the account dated no earlier than 12 months prior to retirement. The statement must reflect any distribution of the account balance, any lump sum withdrawals, and any regular payments.

7-III.H. INCOME FROM EXCLUDED SOURCES

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to follow the verification hierarchy, document why third-party verification is not available, or report the income on the 50058. Fully excluded income is defined as income that is entirely excluded from the annual income determination (for example, food stamps, earned income of a minor, or foster care funds) [Notice PIH 2013-04].

PHAs may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that a source of income qualifies for full exclusion, PHAs have the option of requiring additional verification.

For partially excluded income, the PHA **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is

included in annual income (for example, the income of an adult full-time student, or income excluded under the earned income disallowance).

HACSD Policy

The HACSD will accept the family's self-certification as verification of fully excluded income.

The HACSD will verify the source and amount of partially excluded income as described in Part 1 of this chapter. Earned Income Disallowance is an example of partially excluded income. This income must be verified in order to determine the correct amount of the incremental income increase.

7-III.I. ZERO ANNUAL INCOME STATUS

HACSD Policy

There is no minimum income requirement. However, families who report zero or minimal income are required to complete a written certification every 30 days, and provide copies of expense receipts for the 30-day period. The HACSD will conduct an interim to increase the family's rent share upon reinstatement of income.

The family may be required to provide documentation to prove that income, such as unemployment benefits, TANF, SSI, etc., are not being received.

The HACSD may request information from the state employment development department.

The HACSD may run a credit report on the family.

The HACSD may require a family's notarized self-certification, signed under penalty of perjury, stating that it has no income, and explaining how it expects to meet its needs.

7-III.J. STUDENT FINANCIAL ASSISTANCE [Notice PIH 2015-21]

Any financial assistance, in excess of amounts received for tuition, that a person attending an institution of higher education receives under the Higher Education Act of 1965, from private sources, or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are seeking or receiving HCV assistance [24 CFR 5.609(b)(9) and FR 4/10/06].

For students over the age of 23 with dependent children or students residing with parents who are seeking or receiving HCV assistance, the full amount of student financial assistance is excluded from annual income [24 CFR 5.609(c)(6)]. The full amount of student financial assistance is also excluded for students attending schools that do not qualify as institutions of higher education (as defined in Exhibit 3-2). Excluded amounts are verified only if, without verification, the PHA would not be able to determine whether or to what extent the income is to be excluded (see section 7-III.H).

HACSD Policy

The "Student Eligibility Checklist" must be completed and retained in the file for all student 18 years of age and older.

School financial assistance, scholarships, work-study (federal, state, or local), and grants received by full- or part-time students are excluded income, unless the income must be counted as family income as indicated below:

Athletic Scholarship

The housing component of an athletic scholarship is counted as income.

Student Eligibility and Financial Aid Included in Annual Income

In accordance with 24 CFR 5.609 (b)(9), unless a student applying for assistance or receiving assistance on their own, including the head of household, spouse, or co-head, is over the age of 23 with a dependent child, or residing with parents receiving or eligible to receive Section 8 assistance, all financial aid (excluding loans) that exceeds the cost of tuition, is **counted** as income if it is from the following sources: (a) amounts received under the Higher Education Act of 1965, such as Pell Grants and Federal Work Study; (b) amounts received from a private source, such as an individual, a trust, or a corporation; (c) amounts received from an institution of higher education, as defined under the Higher Education Act of 1965; (d) other financial aid, such as amounts received for veterans under the G.I. Bill.

For a student subject to having a portion of their student financial assistance included in annual income in accordance with 24 CFR 5.609(b)(9), the PHA will request written third-party verification of both the source and the amount. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, the PHA will request written verification of the student's tuition amount.

If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.

7-III.K. PARENTAL INCOME OF STUDENTS SUBJECT TO ELIGIBILITY RESTRICTIONS

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from their parents or a *vulnerable youth* in accordance with PHA policy [24 CFR 5.612, FR Notice 4/10/06, p. 18146, and FR Notice 9/21/16].

This provision does not apply to students residing with parents who are seeking or receiving HCV assistance. It is limited to students who are seeking or receiving assistance on their own, separately from their parents.

HACSD Policy

The income of the parents of a non-independent student will be counted to determine income eligibility based on a written certification, under penalty of perjury, completed by the parents. The HACSD will determine the income eligibility of the non-independent student's parents as follows:

If the student's parents are married and living together, the HACSD will obtain a joint income declaration and certification of joint income from the parents.

If the student's parent is widowed or single, the HACSD will obtain an income declaration and certification of income from that parent.

If the student's parents are divorced or separated, the HACSD will obtain an income declaration and certification of income from each parent.

If the student has been living with one of their parents and has not had contact with or does not know where to contact their other parent, the HACSD will require the student to submit a certification describing the circumstances and stating that the student does not receive financial assistance from the other parent. The HACSD will then obtain an income declaration and certification of income from the parent with whom the student has been living.

The HACSD will use the income limits that apply where the parent with the highest income lives.

PART IV: VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Pregnant Applicant/Participant

An unborn child is not eligible for a dependent allowance.

Dependent Deduction

See Chapter 6 (6-II.B.) for a full discussion of this deduction. The PHA must verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse, or cohead of the family and is not a foster child
- Any person 18 years of age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student.

Elderly/Disabled Family Deduction

See Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (6-II.C.) for a discussion of the deduction. The PHA must verify that the head, spouse, or cohead is 62 years of age or older or a person with disabilities.

7-IV.B. MEDICAL EXPENSE DEDUCTION

Policies related to medical expenses are found in 6-II.D. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

HACSD Policy

It is the responsibility of the family to provide documentation of expenses in the format required by the HACSD. Expenses that cannot be supported by clear and acceptable documentation will be disallowed. Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

The HACSD will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The HACSD will also accept evidence of monthly payments or total payments what will be due for medical expenses during the upcoming 12 months.

Written third-party verification forms if the family is unable to provide acceptable documentation.

If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified medical expenses.

- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

Eligible Household

The medical expense deduction is permitted only for households in which the head, spouse, or cohead is at least 62, or a person with disabilities. The PHA must verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter and as described in Chapter 7 (7-IV.A.) of this plan.

Qualified Expenses

To be eligible for the medical expenses deduction, the costs must qualify as medical expenses. See Chapter 6 (6-II.D.) for the PHA's policy on what counts as a medical expense.

HACSD Policy

Prescribed Medicines and Drugs: Must be prescribed by a doctor (does not include medical marijuana). The family must provide legible pharmacy receipts that clearly indicate the expense amount in U.S. dollars, date, and the type of medicine purchased.

Nonprescription Medicines: Refer to IRS Publication 502 guidelines for the handling of nonprescription medicines. Items that are taken to maintain your ordinary health, and are not for medical care will not be allowed as a medical expense, except for insulin; medical expense amounts paid for a drug that is not prescribed is generally not an eligible medical expense. For example, the doctor recommends that the participant takes aspirin, but aspirin is a drug that does not require a physician's prescription, so the cost is not an eligible medical expense.

As a reasonable accommodation, non-prescription medical items recommended by a medical professional as a treatment may be allowed medical expenses if there is a direct relationship between the specific medical condition and the need for the non-prescription medical item(s) and that, without the non-prescription medical items, the person's medical condition would deteriorate. Medical marijuana is excluded.

Herbal Medicines: To be allowed, the family must provide a medical professional's written recommendation for the necessity of their use as a necessary treatment directly administered or supervised by a licensed medical professional for a specific medical condition. To be allowed, the name of the herbal medicine and the quantity recommended should be established. The family must also provide legible receipts that clearly indicate the amount in U.S. dollars, date, type and quantity of herbal medicine purchased. Medical marijuana is excluded.

Vitamins: To be allowed, the vitamins must be prescribed, purchased from a pharmacy, and accompanied by a medical professional's written recommendation for their use as a necessary treatment for a specific medical condition. The family must also provide legible pharmacy receipts that clearly indicate the amount in U.S. dollars, date and type of vitamins purchased.

Mileage for Medical Appointments: The HACSD will provide allowances for mileage expenses for medical appointments at the lower of the current IRS standard mileage rate, as long as copies of mileage logs are provided. Mileage logs must be documented with starting address and destination address, odometer readings with beginning and ending mileage, and purpose and date of visit. Bus, trolley, or cab fare must be documented with legible receipts that provide the date and cost of the trip along with destination address and purpose of the trip. Transportation expenses for medical appointments outside of the United States are not allowed.

Medical Services: To be allowed, the family must provide legible receipts that clearly indicate the medical services, the amount in U.S. dollars, dates of the services, the names and

addresses of the medical providers, and that the providers are physicians, surgeons, specialists, or other medical practitioners.

Medical Devices: To be allowed as a medical expense, a medical device must be directly related and created to treat or assist in treating a specific disease or medical condition. For example, a blood tester for a person with diabetes is an eligible medical expense, as is a blood pressure device for a person with high blood pressure, or an oxygen unit for a person with emphysema.

Medical supplements in solid or liquid form: To be allowed, the supplements must be prescribed, purchased from a pharmacy, and accompany a medical professional's written recommendation for their use as a treatment for a specific medical condition. The family must also provide legible pharmacy receipts that clearly indicate the amount in U.S. dollars, the date and type of supplements purchased.

Medical Insurance premiums: Must provide receipts or official documentation of current monthly premiums.

Unreimbursed Expenses

To be eligible for the medical expenses deduction, the costs must not be reimbursed by another source.

HACSD Policy

Families, who claim medical expenses, must submit a certification indicating if medical expenses have been, or will be, reimbursed by an outside source. It is the responsibility of the family to provide documentation of expenses in the format required by the HACSD. Expenses supported by confusing, unclear, or non-descriptive documentation will be disallowed. All medical expense claims will be verified by one or more of the methods listed below:

Written verification by a doctor, hospital, clinic personnel, dentist, pharmacist, of (a) the anticipated medical costs to be incurred by the family and regular payments due on medical bills; and (b) the expenses to be reimbursed by an insurance agency or a government agency

Written confirmation by the insurance company, or employer, of health insurance premiums to be paid by the family

Written confirmation from the Social Security Administration on Medicare premiums to be paid by the family over the next 12 months. A computer printout, or copy of award letter indicating Medicare deductions, will be accepted.

Expenses Incurred in Past Years

HACSD Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the HACSD will verify:

The anticipated repayment schedule,

The amounts paid in the past, and

Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

Attendant Care

HACSD Policy

Attendant care verifications include:

- A reliable, knowledgeable, professional's certification that the assistance of an attendant is necessary as a medical expense with a projection of the number of hours the care is needed.
- An attendant's written confirmation of the hours of care provided, and the amount and frequency of payments received from the family or agency (or copies of canceled checks the family used to make those payments), or pay stubs, or written verification from the agency providing the services.
- Receipts, canceled checks, or pay stubs that clearly reflect and describe medical costs and insurance expenses likely to be incurred in the next 12 months will be accepted.
- Copies of payment agreements or most recent invoices to verify payments made on outstanding medical bills will continue over all or part of the next 12 months.
- Receipts or other records of medical expenses incurred during the past 12 months that can be used to anticipate future medical expenses may be accepted. The HACSD may use this approach for "general medical expenses," such as non-prescription drugs, and regular visits to doctors or dentists, but not for one-time, nonrecurring expenses from the previous year.

Auxiliary Apparatus

HACSD Policy

Expenses for auxiliary apparatus will be verified through:

Receipts for purchases, or proof of monthly payments, and maintenance expenses for auxiliary apparatus

In the case where the person with disabilities is employed, required documentation includes a statement from the employer stating that the auxiliary apparatus is necessary for employment. In the case where the auxiliary apparatus allows another adult to work, required documentation includes a statement from the family that the apparatus is necessary to allow an adult family member to work.

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in 6-II.E.).
- The expense is not reimbursed from another source (as described in 6-II.E.).

HACSD Policy

Service Animals

In order for the cost of a service animal to be an eligible disability expense, the family must provide documentation from the agency that trained the service animal that describes the type of animal and the animal's unique skills and abilities, as well as a verification from a medical professional regarding the need for the service animal to provide disability assistance services.

The cost of an approved service animal, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care will be eligible disability expenses.

Family Member is a Person with Disabilities

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

HACSD Policy

The HACSD will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

HACSD Policy

The family will be required to certify whether attendant care or auxiliary apparatus expenses are paid by or reimbursed to the family from any source, and the amount of any reimbursement received.

7-IV.D. CHILD CARE EXPENSES

Policies related to childcare expenses are found in Chapter 6 (6-II.F). The amount of the deduction will be verified following the standard verification procedures described in Part I of this chapter. In addition, the PHA must verify that:

- The child is eligible for care (12 or younger).
- The costs claimed are not reimbursed.
- The costs enable a family member to work, actively seek work, or further their education.
- The costs are for an allowable type of childcare.
- The costs are reasonable.

Eligible Child

To be eligible for the childcare deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense

To be eligible for the childcare deduction, the costs must not be reimbursed by another source.

HACSD Policy

The family must certify if any childcare expenses have been, or will be, paid or reimbursed by outside sources.

Pursuing an Eligible Activity

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

HACSD Policy

Information to be Gathered

The HACSD will compare the hours of childcare with the activities engaged in by the adult household member requiring the child care in order to actively seek work, pursue education or be gainfully employed. A copy of the schedule of classes, employer verification of work hours, or log indicating job-seeking activities may be requested to verify the need for child care.

Seeking Work

The HACSD will request documentation in the form of a written log indicating the date, beginning and ending times, and the names and addresses where the adult family member went to actively seek employment.

Furthering Education

The HACSD will request proof of enrollment in an academic or vocational school or a formal training program and the hours of classes or training. The documentation may be provided by the family and may include a copy of the schedule of classes.

The number of hours claimed for child care may not exceed the number of hours the family member is attending school, plus reasonable transportation time not to exceed one hour per day.

EXHIBIT 8-1: OVERVIEW OF HUD HOUSING QUALITY STANDARDS

Note: This document provides an overview of HQS. For more detailed information see the following documents:

- 24 CFR 982.401, Housing Quality Standards (HQS)
- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)

Sanitary Facilities

The dwelling unit must include sanitary facilities within the unit. The sanitary facilities must be usable in privacy and must be in proper operating condition and adequate for personal cleanliness and disposal of human waste.

Food Preparation and Refuse Disposal

The dwelling unit must have space and equipment suitable for the family to store, prepare, and serve food in a sanitary manner.

Space and Security

The dwelling unit must provide adequate space and security for the family. This includes having at least one bedroom or living/sleeping room for each two persons.

Thermal Environment

The unit must have a safe system for heating the dwelling unit. Air conditioning is not required but if provided must be in proper operating condition. The dwelling unit must not contain unvented room heaters that burn gas, oil, or kerosene. Portable electric room heaters or kitchen stoves with built-in heating units are not acceptable as a primary source of heat for units located in climatic areas where permanent heat systems are required.

Illumination and Electricity

Each room must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. The dwelling unit must have sufficient electrical sources so occupants can use essential electrical appliances. Minimum standards are set for different types of rooms. Once the minimum standards are met, the number, type and location of electrical sources are a matter of tenant preference.

Structure and Materials

The dwelling unit must be structurally sound. Handrails are required when four or more steps (risers) are present, and protective railings are required when porches, balconies, and stoops are thirty inches or more off the ground. The elevator servicing the unit must be working [if there is one]. Manufactured homes must have proper tie-down devices capable of surviving wind loads common to the area.

Interior Air Quality

The dwelling unit must be free of air pollutant levels that threaten the occupants' health. There must be adequate air circulation in the dwelling unit. Bathroom areas must have one openable window or other adequate ventilation. Any sleeping room must have at least one window. If a window was designed to be opened, it must be in proper working order.

Water Supply

The dwelling unit must be served by an approved public or private water supply that is sanitary and free from contamination. Plumbing fixtures and pipes must be free of leaks and threats to health and safety.

Lead-Based Paint

Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:

- Disclose known lead-based paint hazards to prospective tenants before the lease is signed,
- provide all prospective families with "Protect Your Family from Lead in Your Home",
- Stabilize deteriorated painted surfaces and conduct hazard reduction activities within 30 days when identified by the PHA
- Notify tenants each time such an activity is performed
- Conduct all work in accordance with HUD safe practices
- As part of ongoing maintenance ask each family to report deteriorated paint
- Maintain covered housing without deteriorated paint if there is child under six in the family

For units occupied by elevated blood lead level (lead poisoned) children under six years of age, an environmental investigation must be conducted (paid for by the PHA). If lead hazards are identified during the environmental investigation, the owner must complete hazard reduction activities within 30 days.

See HCV GB for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.

Access

Use and maintenance of the unit must be possible without unauthorized use of other private properties. The building must provide an alternate means of exit in case of fire.

Site and Neighborhood

The site and neighborhood must be reasonably free from disturbing noises and reverberations, excessive trash or vermin, or other dangers to the health, safety, and general welfare of the occupants.

Sanitary Condition

The dwelling unit and its equipment must be in sanitary condition and free of vermin and rodent infestation. The unit must have adequate barriers to prevent infestation.

Smoke Detectors

Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any person with a hearing impairment, smoke detectors must have an appropriate alarm system as specified in NFPA 74 (or successor standards).

Hazards and Health/Safety

The unit, interior and exterior common areas accessible to the family, the site, and the surrounding neighborhood must be free of hazards to the family's health and safety.

**EXHIBIT 8-2: SUMMARY OF TENANT PREFERENCE AREAS
RELATED TO HOUSING QUALITY**

Note: This document provides an overview of unit and site characteristics and conditions for which the family determines acceptability. For more detailed information see the following documents:

- Housing Choice Voucher Guidebook, Chapter 10.
 - HUD Housing Inspection Manual for Section 8 Housing
 - HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)
- Provided the minimum housing quality standards have been met, HUD permits the family to determine whether the unit is acceptable with regard to the following characteristics.
- *Sanitary Facilities.* The family may determine the adequacy of the cosmetic condition and quality of the sanitary facilities, including the size of the lavatory, tub, or shower; the location of the sanitary facilities within the unit; and the adequacy of the water heater.
 - *Food Preparation and Refuse Disposal.* The family selects size and type of equipment it finds acceptable. When the family is responsible for supplying cooking appliances, the family may choose to use a microwave oven in place of a conventional oven, stove, or range. When the owner is responsible for providing cooking appliances, the owner may offer a microwave oven in place of an oven, stove, or range only if other subsidized and unsubsidized units on the premises are furnished with microwave ovens only. The adequacy of the amount and type of storage space, the cosmetic conditions of all equipment, and the size and location of the kitchen are all determined by the family.
 - *Space and Security.* The family may determine the adequacy of room sizes and room locations. The family is also responsible for deciding the acceptability of the type of door and window locks.
 - *Energy conservation items.* The family may determine whether the amount of insulation, presence of absence of storm doors and windows and other energy conservation items are acceptable.
 - *Illumination and Electricity.* The family may determine whether the location and the number of outlets and fixtures (over and above those required to meet HQS standards) are acceptable or if the amount of electrical service is adequate for the use of appliances, computers, or stereo equipment.
 - *Structure and Materials.* Families may determine whether minor defects, such as lack of paint, or worn flooring or carpeting will affect the livability of the unit.
 - *Indoor Air.* Families may determine whether window and door screens, filters, fans, or other devices for proper ventilation are adequate to meet the family's needs. However, if screens are present they must be in good condition.
 - *Sanitary Conditions.* The family determines whether the sanitary conditions in the unit, including minor infestations, are acceptable.
 - *Neighborhood conditions.* Families may determine whether neighborhood conditions such as the presence of drug activity, commercial enterprises, and convenience to shopping will affect the livability of the unit.

Families have no discretion with respect to lead-based paint standards and smoke detectors.

Chapter 9 - GENERAL LEASING POLICIES

Introduction

Chapter 9 covers the lease-up process from the family's submission of a Request for Tenancy Approval to execution of the HAP contract.

In order for the PHA to assist a family in a particular dwelling unit, or execute a Housing Assistance Payments (HAP) contract with the owner of a dwelling unit, the PHA must determine that all the following program requirements are met:

- The unit itself must qualify as an eligible unit [24 CFR 982.305(a)]
- The unit must be inspected by the PHA and meet the Housing Quality Standards (HQS) [24 CFR 982.305(a)]
- The lease offered by the owner must be approvable and must include the required Tenancy Addendum [24 CFR 982.305(a)]
- The rent to be charged by the owner for the unit must be reasonable [24 CFR 982.305(a)]
- The owner must be an eligible owner, approvable by the PHA, with no conflicts of interest [24 CFR 982.306]
- For families initially leasing a unit only: Where the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family cannot exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]

9-I.A. TENANT SCREENING

The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy [24 CFR 982.307(a)(1)].

The PHA may elect to screen applicants for family behavior or suitability for tenancy. See Chapter 3 for a discussion of the PHA's policies with regard to screening applicant families for program eligibility [24 CFR 982.307(a)(1)].

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before PHA approval of the tenancy, the PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner [24 CFR 982.307(a)(2)]. The PHA must also inform the owner or manager or their rights and obligations under the Violence against Women Act of 2013 (VAWA) [24 CFR 5.2005(a)(2)].

The PHA must provide the owner with the family's current and prior address (as shown in the PHA records) and the name and address (if known to the PHA) of the landlord at the family's current and prior address [24 CFR 982.307(b)(1)].

The PHA is permitted, but not required, to offer the owner other information in the PHA's possession about the tenancy history or drug trafficking of family members [24 CFR 982.307(b)(2)].

The PHA's policy on providing information to the owner must be included in the family's briefing packet [24 CFR 982.307(b)(3)].

The PHA may not disclose to the owner any confidential information provided by the family in response to a PHA request for documentation of domestic violence, dating violence, sexual assault, or stalking except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(b)(4)].

HACSD Policy

The HACSD will inform owners that it is the responsibility of the landlord to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, payment of utility bills, eviction history, respecting the rights of other residents, damage to units, drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

A statement of the HACSD's policy on release of information to prospective landlords is applied uniformly to all families and will be included in the family's briefing packet.

The owner may request the HACSD obtain and review criminal or sex-offender registration records for grounds to deny a tenant application or evict a tenant. The HACSD will charge the owner a fee based on the costs incurred by the HACSD, including the costs charged by the law enforcement agency, the HACSD staff time and administrative costs. The owner may not charge the tenant for this fee.

The HACSD **must not** release any criminal information or sex-offender information to the owner, but a Housing Supervisor will review the information, and if no information relevant to application or eviction is found, will notify the owner. If information relevant to the application or eviction is found, the Housing Supervisor will present their findings in writing to the Program Coordinator, who will authorize the findings and sign the letter issued to the owner. The letter will not specify the criminal or sex-offender history, but will merely state that there may be cause for denial or eviction of the tenant. If the owner sends documentation of needing specific information for an eviction, the Program Coordinator must approve the release of any information in accordance with the regulations [24 CFR 5.903, 24 CFR 5.905].

The HACSD must not release specific personal information to owners regarding their former Section 8 tenants.

9-I.B. REQUESTING TENANCY APPROVAL [Form HUD-52517]

After the family is issued a voucher, the family must locate an eligible unit, with an owner or landlord willing to participate in the voucher program. Once a family finds a suitable unit and the owner is willing to lease the unit under the program, the owner and the family must request the PHA to approve the assisted tenancy in the selected unit.

The owner and the family must submit two documents to the PHA:

- Completed Request for Tenancy Approval (RFTA) – Form HUD-52517
- Copy of the proposed lease, including the HUD-prescribed Tenancy Addendum – Form HUD-52641-A

The RFTA contains important information about the rental unit selected by the family, including the unit address, number of bedrooms, structure type, year constructed, utilities included in the rent, and the requested beginning date of the lease, necessary for the PHA to determine whether to approve the assisted tenancy in this unit.

Owners must certify to the most recent amount of rent charged for the unit and provide an explanation for any difference between the prior rent and the proposed rent.

Owners must certify that they are not the parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has granted a request for reasonable accommodation for a person with disabilities who is a member of the tenant household.

For units constructed prior to 1978, owners must either 1) certify that the unit, common areas, and exterior have been found to be free of lead-based paint by a certified inspector; or 2) attach a lead-based paint disclosure statement.

Both the RFTA and the proposed lease must be submitted no later than the expiration date stated on the voucher. [HCV GB].

HACSD Policy

During the term of the voucher, the family must submit the RFTA and a copy of the proposed lease, including the HUD-prescribed tenancy addendum. If the owner uses a standard lease form for rental to unassisted tenants, the lease must be in such standard form (plus the HUD-prescribed tenancy addendum). If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such the HACSD/HUD model lease (including the HUD-prescribed tenancy addendum). The family must submit the RFTA in the form and manner required by the HACSD.

The RFTA must be signed by both the family and the owner.

The owner may submit the RFTA on behalf of the family.

If families are approved to lease properties owned by relatives, the owner's current address will be compared to the subsidized unit's address.

Owners must provide an employer identification number or social security number, as well as a validation document supporting the number. Ownership will be verified through assessor's office records or a review of the grant deed. The HACSD will request a copy of the management agreement for owners being represented by a management company. The HACSD may request documentation of ownership such as a grant deed, copy of the current tax bill, or other documentation.

The HACSD will not permit the family to submit more than one RFTA at a time.

When the family submits the RFTA the HACSD will review the RFTA for completeness.

The RFTA will be approved if:

The unit is an eligible type of housing.

The unit meets HUD's Housing Quality Standards (HQS), and any additional criteria identified in this Plan.

The rent is reasonable.

The proposed lease complies with HUD requirements.

The owner is approvable, and there is no owner conflict of interest.

The owner has not been debarred by HUD or the PHA.

The family is not leasing a property owned by a parent, child, grandparent, grandchild, sister or brother of any family member. The HACSD will waive this restriction as a reasonable accommodation for a family member with disabilities who provides documentation demonstrating a clear and compelling need for accommodation.

The owner's address is not the same as the assisted unit, except for some special housing types and Section 8 Homeownership.

In addition to the above, if the gross rent exceeds the payment standard at the time a family initially receives assistance in the unit (new admissions and moves), the family share of rent must not exceed 40 percent of the family monthly-adjusted income.

9-I.C. OWNER PARTICIPATION

The PHA does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where the PHA may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. There are also criteria for which the PHA must disapprove an owner. No owner has a right to participate in the HCV program [24 CFR 982.306(e)]

See Chapter 13 for a full discussion of owner qualification to participate in the HCV program.

9-I.D. ELIGIBLE UNITS

There are a number of criteria that a dwelling unit must meet in order to be eligible for assistance under the voucher program. Generally, a voucher-holder family may choose any available rental dwelling unit on the market in the PHA's jurisdiction. This includes the dwelling unit they are currently occupying.

Ineligible Units [24 CFR 982.352(a)]

The PHA may not assist a unit under the voucher program if the unit is a public housing or Indian housing unit; a unit receiving project-based assistance under section 8 of the 1937 Act (42

U.S.C. 1437f); nursing homes, board and care homes, or facilities providing continual psychiatric, medical, or nursing services; college or other school dormitories; units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions; a unit occupied by its owner or by a person with any interest in the unit.

Special Housing Types [24 CFR 982 Subpart M]

HUD regulations permit, but do not generally require, the PHA to permit families to use voucher assistance in a number of special housing types in accordance with the specific requirements applicable to those programs. These special housing types include single room occupancy (SRO) housing,

congregate housing, group home, shared housing, manufactured home space (where the family owns the manufactured home and leases only the space), cooperative housing and homeownership option. See Chapter 15 for specific information and policies on any of these housing types that the PHA has chosen to allow.

The regulations do require the PHA to permit use of any special housing type if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

HACSD Policy

The HACSD will approve the following types of housing, providing they meet all program requirements:

All eligible structure types which, are defined as a dwelling unit that is designed and used exclusively for permanent residential occupancy.

A mobile home that is designed to be set-up permanently in one location is eligible for Section 8 rental assistance.

Manufactured homes where the tenant leases the mobile home and the pad.

Manufactured homes where the tenant owns the mobile home and leases the pad.

Congregate facilities (only the shelter rent is assisted).

Single Room Occupancy (SRO).

Shared housing.

Group homes.

Travel trailers, motor homes, or other structures designed to be mobile or temporary **are not** eligible for Section 8 rental assistance. A unit that is registered with the Department of Motor Vehicles rather than the state Department of Housing and Community Development is not an eligible housing type.

A family can own a rental unit but cannot reside in it while being assisted, except in the cases of the family owning the mobile home and leasing the pad, a Section 8 Homeownership participant, or the owner of a cooperative. The owner of the assisted unit, except in the case of a mobile home owner leasing the pad, a Section 8 Homeownership participant, or the owner of a cooperative, may never benefit from the assistance. The owner of the assisted unit may never be a live-in aide for the family. In shared housing, the family may never, in any circumstances, reside with a resident owner who is a relative, unless an exception is granted for reasonable accommodation.

The HACSD may not permit a voucher holder to lease a unit that is receiving project-based Section 8 assistance or any other duplicative rental subsidies.

Duplicative Assistance [24 CFR 982.352(c)]

A family may not receive the benefit of HCV tenant-based assistance while receiving the benefit of any of the following forms of other housing subsidy, for the same unit or for a different unit:

- Public or Indian housing assistance;
- Other Section 8 assistance (including other tenant-based assistance);
- Assistance under former Section 23 of the United States Housing Act of 1937 (before amendment by the Housing and Community Development Act of 1974);
- Section 101 rent supplements;

- Section 236 rental assistance payments;
- Tenant-based assistance under the HOME Program;
- Rental assistance payments under Section 521 of the Housing Act of 1949 (a program of the Rural Development Administration);
- Any local or State rent subsidy;
- Section 202 supportive housing for the elderly;
- Section 811 supportive housing for persons with disabilities; (11) Section 202 projects for non-elderly persons with disabilities (Section 162 assistance); or
- Any other duplicative federal, State, or local housing subsidy, as determined by HUD. For this purpose, 'housing subsidy' does not include the housing component of a welfare payment, a social security payment received by the family, or a rent reduction because of a tax credit.

Housing Quality Standards (HQS) [24 CFR 982.305 and 24 CFR 982.401]

In order to be eligible, the dwelling unit must be in decent, safe and sanitary condition. This determination is made using HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD. See Chapter 8 for a full discussion of the HQS standards, as well as the process for HQS inspection at initial lease-up.

HACSD Policy

HQS standards allow a maximum occupancy of two persons per sleeping area, as shown in the table below. Sleeping areas would include: living room, bedroom, den, dining room, library, or other rooms that may be used for sleeping.

A sleeping room will only be considered a bedroom for payment standard and utility allowance purposes if it was designed to be used as a bedroom or to be converted to a bedroom, is private with a door that closes, and has a window that opens to the outside for light and ventilation. The room will not be considered a bedroom for payment standard or utility allowance purposes if the room is designed for another purpose; used as a corridor to access another room; or if it has something installed that indicates it has another use, such as a water heater, washer/dryer hookups, gas line for a stove, etc.; or if it is not accessible from inside the main dwelling unit, such as in an outbuilding; or if the sleeping room is only accessible through the garage or backyard. A bedroom conversion must also have the proper permit from the local code enforcement agency in order to be considered a bedroom for payment standard and utility allowance purposes.

HQS GUIDELINES FOR MAXIMUM OCCUPANTS

Unit Size	Maximum Number Allowed in Household*
0 Bedroom	2
1 Bedroom	4
2 Bedrooms	6
3 Bedrooms	8
4 Bedrooms	10
5 Bedrooms	12
6 Bedrooms	14

*These guidelines are for an average unit. If there is a den, library or dining room or other room that may be used for sleeping, in addition to the living room, these standards may be increased. For example, a two-bedroom house with a living room and a den may have room for up to eight persons without violating HQS space requirements.

Unit Size

In order to be eligible, the dwelling unit must be appropriate for the number of persons in the household. A family must be allowed to lease an otherwise acceptable dwelling unit with fewer bedrooms than the number of bedrooms stated on the voucher issued to the family, provided the unit meets the applicable HQS space requirements [24 CFR 982.402(d)]. The family must be allowed to lease an otherwise acceptable dwelling unit with more bedrooms than the number of bedrooms stated on the voucher issued to the family. See Chapter 5 for a full discussion of subsidy standards.

HACSD Policy

The family may select a different size dwelling unit than that listed on the voucher. There are three criteria to consider:

Subsidy Limitation: The payment standard for a family shall be the **lower of**:

- The HACSD payment standard amount for the family voucher size; or
- The HACSD payment standard amount for the unit size rented by the family; or
- The contract rent and utilities (gross rent).

Utility Allowance: The utility allowance used to calculate the gross rent is based on the lower of the actual size of the unit the family selects or the family's voucher size. As a reasonable accommodation, a person with a disability who provides medical verification of higher utility costs due to the disability may receive a higher utility allowance of 10 percent over the standard utility allowance for the utility that is more costly due to that person's disability.

Rent Reasonableness [24 CFR 982.305 and 24 CFR 982.507]

In order to be eligible, the dwelling unit must have a reasonable rent. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises. See Chapter 8 for a full discussion of rent reasonableness and the rent reasonableness determination process.

Rent Burden [24 CFR 982.508]

Where a family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the family share cannot exceed 40 percent of the family's adjusted monthly income. The term "family share" refers to the amount the family pays toward rent and utilities. The gross rent for the unit minus the total housing assistance payment (HAP) for the unit equals the family share. See Chapter 6 for a discussion of calculation of gross rent, the use of payment standards, and calculation of family income, family share of rent and HAP.

9-I.E. LEASE AND TENANCY ADDENDUM

The family and the owner must execute a written dwelling lease agreement for the assisted unit. This written lease is a contract between the tenant family and the owner; the PHA is not a party to this contract.

The tenant must have legal capacity to enter a lease under State and local law. 'Legal capacity' means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner [24 CFR 982.308(a)]

Lease Form and Tenancy Addendum [24 CFR 982.308]

If the owner uses a standard lease form for rental to unassisted tenants in the locality or the premises, the lease must be in such standard form. If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease. The HAP contract prescribed by HUD contains the owner's certification that if the owner uses a standard lease form for rental to unassisted tenants, the lease for the assisted tenants is in such standard form.

All provisions in the HUD-required Tenancy Addendum must be added word-for-word to the owner's standard lease form. The Tenancy Addendum includes the HUD requirements for the tenancy. Because it is a part of the lease, the tenant shall have the right to enforce the Tenancy Addendum against the owner. If there is a conflict between the owner's lease and the Tenancy Addendum, the terms of the Tenancy Addendum shall prevail over any other provisions of the lease.

HACSD Policy

The family and owner may submit a standard form of lease used in the locality by the owner that is generally used for other unassisted tenants on the premises. If the owner does not use a standard lease for rental to unassisted tenants, the owner may use another form of lease, such as a HACSD/HUD model lease. The terms and conditions of the lease must be consistent with state and local law.

The HACSD will review the lease for HUD required lease provisions. The tenant must have legal capacity to enter a lease under state and local law. Responsibility for utilities, appliances and optional services must correspond to those provided on the RFTA.

Lease Information [24 CFR 982.308(d)]

The assisted dwelling lease must contain all of the required information as listed below:

- The names of the owner and the tenant:
- The unit rented (address, apartment number, and any other information needed to identify the contract unit)
- The term of the lease (initial term and any provisions for renewal)
- The amount of the monthly rent to owner
- A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family

HACSD Policy

The HUD prescribed tenancy addendum must be included in the lease.

The owner's lease must include the lead warning statement, and disclosure information required by 24 CFR 35.92(b).

The provisions required under the Violence Against Women Act (VAWA) for all leases executed after April 30, 2007, must be included.

The lease must state that drug-related criminal activity engaged in by the tenant, any household member, any guest on or near the premises, or any person under the tenant's control on the premises, is grounds for termination of tenancy.

The lease must state that the family may be evicted if the owner determines:

- Any household member is illegally using a drug.
- A pattern of illegal use of drugs by any household member interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

The lease must state that the following types of criminal activities by a "covered person" are grounds for termination of tenancy:

- Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including property management staff residing on the premises).
- Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the residences by people residing in the immediate vicinity of the premises.
- Any violent criminal activity on or near the premises by a tenant, household member, or guest.
- Any violent criminal activity on the premises by any other person under the tenant's control.

The lease must state that the owner may terminate tenancy if a tenant is:

- Fleeing to avoid prosecution, custody, or confinement for a felony (high misdemeanor in New Jersey) after conviction of a crime or attempt to commit a crime.
- Violating a condition of probation or parole imposed under state or federal law.

Term of Assisted Tenancy

The initial term of the assisted dwelling lease must be for at least one year [24 CFR 982.309]. The initial lease term is also stated in the HAP contract.

The HUD program regulations permit the PHA to approve a shorter initial lease term if certain conditions are met.

HACSD Policy

The HACSD will allow an initial lease term of less than one (1) year.

During the initial term of the lease, the owner may not raise the rent to owner [24 CFR 982.309].

Any provisions for renewal of the dwelling lease will be stated in the dwelling lease [HCV GB]. There are no HUD requirements regarding any renewal extension terms, except that they must be stated in the dwelling lease if they exist.

The PHA may execute the HAP contract even if there is less than one year remaining from the beginning of the initial lease term to the end of the last expiring funding increment under the consolidated ACC. [24 CFR 982.309(b)].

Security Deposit [24 CFR 982.313 (a) and (b)]

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants. However, if the PHA chooses to do so, language to this effect must be added to Part A of the HAP contract [Form HUD-52641].

HACSD Policy

The owner is not required but is encouraged to collect a full security deposit from the tenant.

Security deposits charged by owners may not exceed those charged to unassisted tenants, nor be more than the lesser of legal limitations or the maximum amount indicated on the lease.

Separate Non-Lease Agreements between Owner and Tenant

Owners may not demand or accept any rent payment from the family in excess of the rent to the owner as approved by the PHA minus the PHA's housing assistance payments to the owner

[24 CFR 982.451(b)(4)].

The owner may not charge the tenant extra amounts for items customarily included in rent in the locality, or provided at no additional cost to unsubsidized tenants in the premises [24 CFR 982.510(c)].

HACSD Policy

The HACSD must be informed in advance of all separate agreements and must approve or disapprove of separate agreements. Owners are prohibited from collecting or paying, and tenants are prohibited from paying or receiving additional rent or other credits not authorized by the HACSD. Owners are prohibited from charging for items normally included in the rent of unassisted units.

Owners and families may execute separate agreements for services, appliances, and other items not included in the lease, as well as special purpose charges, such as recycling fees. Any appliances, services or other items, routinely provided to unassisted families as part of the lease (such as air conditioning, dishwasher or garage) or are permanently installed in the unit, cannot be put under separate agreement and must be included in the lease.

The family must pay a minimum of 30 percent of its monthly-adjusted income for rent and utilities and is not allowed to receive rent credits, such as in the case of a move-in special. If there is a temporary rent reduction/credit, the HACSD will compute the reduced contract rent along with the appropriate adjustment in the HAP and notify the owner and family in writing. The family may accept a credit for security deposit.

PHA Review of Lease

The PHA will review the dwelling lease for compliance with all applicable requirements.

HACSD Policy

If the dwelling lease is incomplete or incorrect, the HACSD will notify the family and the owner of the deficiencies.

The PHA is permitted, but is not required, to review the lease to determine if the lease complies with State and local law and is permitted to decline to approve the tenancy if the PHA determines that the lease does not comply with State or local law [24 CFR 982.308(c)]

HACSD Policy

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

9-I.F. TENANCY APPROVAL [24 CFR 982.305]

After receiving the family's Request for Tenancy Approval, with proposed dwelling lease, the PHA must promptly notify the family and owner whether the assisted tenancy is approved.

Prior to approving the assisted tenancy and execution of a HAP contract, the PHA must ensure that all required actions and determinations, discussed in Part I of this chapter have been completed.

These actions include ensuring that the unit is eligible; the unit has been inspected by the PHA and meets the Housing Quality Standards (HQS); the lease offered by the owner is approvable and includes the required Tenancy Addendum; the rent to be charged by the owner for the unit is reasonable; where the family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]; the owner is an eligible owner, not disapproved by the PHA, with no conflicts of interest [24 CFR 982.306]; the family and the owner have executed the lease, including the Tenancy Addendum, and the lead-based paint disclosure information [24 CFR 982.305(b)].

HACSD Policy

A determination must have been made that the family is eligible for a HAP payment.

At the family's request regarding an RFTA, the HACSD will negotiate with the owner to reduce the rent or pay for more of the utilities in the following instances:

- The rent is not reasonable.
- The gross rent exceeds the payment standard upon initial approval of the unit, and it is determined that the rent is not affordable because the family share of rent and utilities would be more than 40 percent of the family's monthly-adjusted income.

If the rent is approved after negotiations with the owner, the HACSD will notate, date, and initial the RFTA or notate the file and continue processing. If the revised rent involves a change in the provision of utilities, the HACSD will notate, date and initial the changes on the submitted RFTA or will notate the file.

If the owner does not agree to the rent reduction after the HACSD has attempted to negotiate a revised rent, the family and owner will be notified in writing that the lease is disapproved, and the family will be issued another RFTA.

9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305]

The HAP contract is a written agreement between the PHA and the owner of the dwelling unit. Under the HAP contract, the PHA agrees to make housing assistance payments to the owner on behalf of the family, and the owner agrees to comply with all program requirements as stated in the HAP contract.

The HAP contract form is prescribed by HUD.

If the PHA has given approval for the family of the assisted tenancy, the owner and the PHA must execute the HAP contract.

The term of the HAP contract must be the same as the term of the lease [24 CFR 982.451(a)(2)].

The PHA is permitted to execute a HAP contract even if the funding currently available does not extend for the full term of the HAP contract.

The PHA must make a best effort to ensure that the HAP contract is executed before the beginning of the lease term. Regardless, the HAP contract must be executed no later than 60 calendar days from the beginning of the lease term.

The PHA may not pay any housing assistance payment to the owner until the HAP contract has been executed. If the HAP contract is executed during the period of 60 calendar days from the beginning of the lease term, the PHA will pay housing assistance payments after execution of the HAP contract (in accordance with the terms of the HAP contract), to cover the portion of the lease term before execution of the HAP contract (a maximum of 60 days).

Any HAP contract executed after the 60-day period is void, and the PHA may not pay any housing assistance payment to the owner.

HACSD Policy

The HACSD cannot enter into a HAP contract if a family is in zero HAP status. In that case, the HACSD must deny the RFTA. However, if the family is eligible for assistance, an RFTA may be processed.

The HACSD prepares the HAP contract for execution. The family and the owner will execute the lease agreement, and the owner and the HACSD will execute the HAP contract. Copies of the documents will be furnished to the parties who signed the respective documents. The HACSD will retain copies of all signed documents. The beginning and ending dates of the lease and the contract **MUST** match.

The HACSD may change the amount of its assistance or contract rent with a contract amendment. Changes in lease term and utilities require a new contract.

The HACSD makes every effort to execute the HAP contract before the commencement of the lease term. The HAP contract may not be executed (signed and dated) more than 60 days after commencement of the lease term, and no payments will be made until the contract is executed. However, regardless of the execution date of the contract, the beginning and ending dates of the contract must always match the beginning and ending dates of the lease [24 CFR 982.305(c)].

The HACSD representatives, Housing Aide or above, are authorized to execute a contract on behalf of the HACSD.

The HACSD may confirm verbally with the tenant the date the tenant received the keys for the unit. If the tenant fails to receive the keys for the unit as of the beginning date of the contract, the HACSD may abate or collect HAPs from the owner and/or terminate the contract.

As required under VAWA 2013, once the HAP contract and lease have been executed and the family has been admitted to the program, the PHA will notify families of their rights under VAWA by providing all families with a copy of the domestic violence certification form (HUD-5382) as well as the VAWA notice of occupancy rights (form HUD-5380).

The owner or owner's representative must provide a telephone number to the HACSD.

See Chapter 13 for a discussion of the HAP contract and contract provisions.

9-I.H. CHANGES IN LEASE OR RENT

If the tenant and the owner agree to any changes in the lease, such changes must be in writing, and the owner must immediately give the PHA a copy of such changes. The lease, including any changes, must remain in accordance with the requirements of this chapter.

Generally, PHA approval of tenancy and execution of a new HAP contract are not required for changes in the lease. However, under certain circumstances, the execution of a new lease and HAP contract are required. These circumstances include:

- Changes in lease requirements governing tenant or owner responsibilities for utilities or appliances
 - Changes in lease provisions governing the term of the lease
 - The family moves to a new unit, even if the unit is in the same building or complex
- In these cases, if the HCV assistance is to continue, the family must submit a new Request for Tenancy Approval (RFTA) along with a new dwelling lease containing the proposed changes. A new tenancy must then be approved in accordance with this chapter.

Where the owner is changing the amount of the rent to owner, the owner must notify the PHA at least 60 days before any such changes go into effect [24 CFR 982.308(g)(4)]. The PHA will agree to such an increase only if the amount of the rent to owner is considered reasonable according to the rent reasonableness standards discussed in Chapter 8. If the requested rent is not found to be reasonable, the owner must either reduce the requested rent increase, or terminate the tenancy in accordance with the terms of the lease.

No rent increase is permitted during the initial term of the lease [24 CFR 982.309(a)(3)].

Rent increase requests are subject to rent control limits under State and local law. (CFR 982.509)

HACSD Policy

An approved contract rent increase, in which the landlord provided proper 60-day notice to the HACSD, will be processed effective the date of the rent increase (even if it must be done retroactively). A contract rent increase will not be approved if the landlord failed to provide proper advance notice to the HACSD. Rent increases will not be approved if they fail to conform with all State and local laws.

If a landlord requests a decrease in contract rent, the HACSD may grant the request with less than a 60-day notice to the HACSD provided that the family has also been noticed. Retroactive requests may be honored provided that it is not more than 90 days from the requested effective date.

Chapter 10 - MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY

INTRODUCTION

Freedom of housing choice is a hallmark of the housing choice voucher (HCV) program. In general, HUD regulations impose few restrictions on where families may live or move with HCV assistance. This chapter sets forth HUD regulations and PHA policies governing moves within or outside the PHA's jurisdiction in two parts:

Part I: Moving with Continued Assistance. This part covers the general rules that apply to all moves by a family assisted under the PHA's HCV program, whether the family moves to another unit within the PHA's jurisdiction or to a unit outside the PHA's jurisdiction under portability.

Part II: Portability. This part covers the special rules that apply to moves by a family under portability, whether the family moves out of or into the PHA's jurisdiction. This part also covers the special responsibilities that the PHA has under portability regulations and procedures.

PART I: MOVING WITH CONTINUED ASSISTANCE

10-I.A. ALLOWABLE MOVES

HUD lists six regulatory conditions under which an assisted family is allowed to move to a new unit with continued assistance. Permission to move is subject to the restrictions set forth in section 10-I.B.

- The family has a right to terminate the lease on notice to the owner (for the owner's breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.354(b)(3)]. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the notice at the same time [24 CFR 982.354(d)(1)].
- The lease for the family's unit has been terminated by mutual agreement of the owner and the family [24 CFR 982.354(b)(1)(ii)].

HACSD Policy

If the family and the owner mutually agree to terminate the lease for the family's unit, the family must give the PHA a copy of the termination agreement.

- The owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family [24 CFR 982.354(b)(2)]. The family must give the PHA a copy of any owner eviction notice [24 CFR 982.551(g)].
- The family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health or safety of the family or family member [24 CFR 982.354(b)(4)]. This condition applies even when the family has moved out of its unit in violation of the lease, with or without prior notification to the PHA, if the family or family member who is the victim reasonably believed that they were imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.354(b)(4), 24 CFR 982.353(b)]. The PHA must adopt an emergency transfer plan as required by regulations at 24 CFR 5.2007(e).

HACSD Policy

If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the HACSD based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, the HACSD will request that the resident request the emergency transfer using form HUD-5383, and the HACSD will request documentation in accordance with section 16-IX.D of this plan.

HACSD reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.

HACSD may choose to provide a voucher to facilitate an emergency transfer of the victim without first terminating the assistance of the perpetrator.

Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.

Unless the HACSD determines extenuating circumstances, assistance on the old and new units may not overlap. The HACSD may not make any housing assistance payment to the owner for any month **after** the month the family moves out. The owner may keep the housing assistance payment for the month when the family moves out of the unit.

If a participant family moves from an assisted unit with continued tenant-based assistance, the term of the assisted lease for the new assisted unit may begin during the month the family moves out of the first assisted unit. Overlap of the last housing assistance payment (for the month when the family moves out of the old unit) and the first assistance payment for the new unit, is not considered to constitute a duplicative housing subsidy.

A move within the same building or project, or between buildings owned by the same owner, will be processed like any other move and there will be no overlapping assistance.

Zero HAP Families Who Wish to Move [24 CFR 982.455]

A participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family.

HACSD Policy

Participants in zero HAP status will remain on the program for 180 days and eligible for reinstatement of benefits if their circumstances change within the 180 days. After 180 days, if the family continues to be ineligible for benefits the family will be dropped from the program.

The family may be transferred to another unit if it is determined the family will be eligible for assistance at another unit, but the family must lease-up within the initial voucher term.

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.

PART II: PORTABILITY

10-II.A. OVERVIEW

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another PHA is known as portability. The PHA that issues the voucher is called the **initial PHA**. The PHA that has jurisdiction in the area to which the family wants to move is called the receiving PHA.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA provides all housing services for the family and bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance with its own program funds, and the initial PHA has no further relationship with the family. The initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the initial PHA's voucher. Based on the receiving PHA's response, the initial PHA must determine whether they will approve or deny the portability request [Notice PIH 2016-09].

PHAs commonly act as both the initial and receiving PHA because families may move into or out of their jurisdiction under portability. Each role involves different responsibilities. The PHA will follow the rules and policies in section 10-II.B when it is acting as the initial PHA for a family. It will follow the rules and policies in section 10-II.C when it is acting as the receiving PHA for a family.

In administering portability, the initial PHA and the receiving PHA must comply with financial procedures required by HUD, including the use of HUD-required forms [24 CFR 982.355(e)(5)].

PHAs must also comply with billing and payment deadlines. HUD may reduce an administrative fee to an initial or receiving PHA if the PHA does not comply with HUD portability requirements [24 CFR 982.355(e)(7)].

10-II.B. INITIAL PHA ROLE

Allowable Moves under Portability

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. When a family provides a written request to move outside of the PHA's jurisdiction, the request must specify the area to which the family want to move. If there is more than one PHA in the area, the initial PHA provides the family with the contact information for the receiving PHAs that serve the area, and the family selects the receiving PHA. The family must inform the initial PHA which receiving PHA it has selected. If the family prefers not to select the receiving PHA, the initial PHA will select the receiving PHA on behalf of the family [24 CFR 982.255(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside the PHA's jurisdiction under portability. HUD regulations and PHA policy determine whether a family qualifies.

Applicant Families

Under HUD regulations, most applicant families qualify to lease a unit outside the PHA's jurisdiction under portability. However, HUD gives the PHA discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance. If a PHA intends to deny a family permission to move under portability due to insufficient funding, the PHA must notify HUD within 10 business days of the determination to deny the move [24 CFR 982.355(e)].

HACSD Policy

The HACSD may, if warranted by funding constraints and if permitted under regulations, deny a family's portability to a higher cost area.

HACSD will follow the policies established in section 10-I.B of this chapter.

In addition, the initial PHA may establish a policy denying the right to portability to nonresident applicants during the first 12 months after they are admitted to the program [24 CFR 982.353(c)].

HACSD Policy

If neither the head nor spouse had a domicile (legal residence) in the HACSD's jurisdiction at the date of initial application for assistance, the family may not be permitted to exercise portability upon initial issuance of a voucher unless the HACSD approves the move.

The HACSD will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2) or reasons related to domestic violence, dating violence, sexual assault, or stalking.

Participant Families

The initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. The Violence against Women Act of 2013 (VAWA) creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of a family member who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking and who reasonably believed they were imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.353(b)].

HACSD Policy

The HACSD will determine whether a participant family may move out of the HACSD's jurisdiction with continued assistance in accordance with the regulations and policies set forth here and in sections 10-I.A and 10-I.B of this chapter.

The HACSD will not permit families to exercise portability if:

- The family owes money to the HACSD, or if the family is delinquent on repayment of monies owed to any other PHA;
- The family is ineligible to move as outlines elsewhere in this chapter; or
- The family is being investigated for possible ineligibility for the program.

The PHA will notify the family of its determination in accordance with the approval policy set forth in section 10-I.C of this chapter.

A family cannot extend its move-out notice if a portability packet has been issued to the receiving PHA.

Determining Income Eligibility

Applicant Families

An applicant family may lease a unit in a particular area under portability only if the family is income eligible for admission to the voucher program in that area [24 CFR 982.353(d)(1)]. The family must specify the area to which the family wishes to move [24 CFR 982.355(c)(1)].

The initial PHA is responsible for determining whether the family is income eligible in the area to which the family wishes to move [24 CFR 982.353(d)(1), 24 CFR 982.355(9)]. If the applicant family is not income eligible in that area, the PHA must inform the family that it may not move there and receive voucher assistance [Notice PIH 2016-09].

Participant Families

The income eligibility of a participant family is not redetermined if the family moves to a new jurisdiction under portability [24 CFR 982.353(d)(2)].

Reexamination of Family Income and Composition

No new reexamination of family income and composition is required for an applicant family.

HACSD Policy

HACSD will not require a new reexamination of family income and composition for the applicant or participant family. The HACSD will make any exceptions to this policy necessary to remain in compliance with HUD regulations.

Briefing

The regulations and policies on briefings set forth in Chapter 5 of this plan require the PHA to provide information on portability to all applicant families that qualify to lease a unit outside the PHA's jurisdiction under the portability procedures. Therefore, no special briefing is required for these families.

HACSD Policy

No formal briefing will be required for a participant family wishing to move outside the PHA's jurisdiction under portability. However, the HACSD will provide the family with the same oral and written explanation of portability that it provides to applicant families selected for admission to the program (see Chapter 5).

The HACSD will provide the name, address, and phone of the contact for the PHAs in the jurisdiction to which they wish to move.

The HACSD will advise the family that they will be under the receiving PHA's policies and procedures, including screening, subsidy standards, voucher extension policies, and payment standards.

Voucher Issuance and Term

An applicant family has no right to portability until after the family has been issued a voucher [24 CFR 982.353(b)]. In issuing vouchers to applicant families, the PHA will follow the regulations and procedures set forth in Chapter 5.

HACSD Policy

For participating families approved to move under portability, the PHA will issue a new voucher within 10 days of receipt of all required documentation. The initial term of the voucher will be a minimum of 60 calendar days.

PART I: ANNUAL REEXAMINATIONS

[24 CFR 982.516]

11-I.A. OVERVIEW

The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.

11-I.B STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(b); [New HCV GB, Reexaminations](#)]

HUD permits PHAs to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years the PHA may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or rate of interest. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.

Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.

Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources. If at least 90 percent of the family's income is from fixed sources, the PHA may streamline the verification of fixed income but is not required to verify non-fixed income amounts. If the family receives less than 90 percent of its income from fixed sources, the PHA may streamline the verification of fixed income and must verify non-fixed income annually.

HACSD Policy

In accordance with HUD requirements, the HACSD will reexamine the income, assets, deductions, allowances and household composition of families at least annually.

HACSD may conduct a streamlined reexamination of income for elderly families and disabled families when 100 percent of the family's income consists of fixed income. HACSD will recalculate family incomes by applying any published cost of living adjustments to the previously verified income amount.

For the purposes of this provision, the term "fixed income" includes income from:

- Social security payments to include Supplemental Security Income (SSI) and Supplemental Security Disability Insurance (SSDI);
- Federal, State, local, and private pension plans; and
- Other periodic payments received from annuities, insurance policies, retirement funds, disability or death benefits, and other similar types of periodic receipts that are of substantially the same amounts from year to year.

11-I.C. SCHEDULING ANNUAL REEXAMINATIONS

The PHA must establish a policy to ensure that the annual reexamination for each family is completed *within* a 12-month period and may require reexaminations more frequently [HCV GB].

HACSD Policy

The HACSD will begin the annual reexamination process 120 days in advance of its scheduled effective date. Generally, the PHA will schedule annual reexamination effective dates to coincide with the family's anniversary date.

Anniversary date is generally defined as 12 months from the effective date of the family's initial examination (admission), or from the effective date of the family's last annual reexamination.

The anniversary date will always be the first day of the month in which the initial examination or the last reexamination occurred.

If the family moves to a new unit, the HACSD will perform a new annual reexamination unless the eligibility booklet was signed within 120 days of the execution of the new HAP contract for the new unit.

The HACSD also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual Reexamination Process

The PHA is required to obtain the information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].

HACSD Policy

The HACSD maintains a reexamination tracking system. The household will be notified in advance of the anniversary date by mail or telephone. An interview may be scheduled, or the reexamination may be conducted through the mail.

If an interview is necessary, the head of household, spouse, or co-head are required to attend a recertification interview, show picture identification, and sign a certification in the presence of a housing representative. Exceptions may be made as a reasonable accommodation for a person with disability, or in emergency circumstances, such as hospitalization.

If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation (see Chapter 2). These accommodations will be granted upon verification of a disability and disability-related need for the requested accommodation:

The HACSD will contact the persons by telephone, through a relay service for the hearing impaired, or in another appropriate manner.

The HACSD will mail the notice to a third party, if requested.

11-I.D. CONDUCTING ANNUAL REEXAMINATIONS

As part of the annual reexamination process, families are required to provide updated information to the PHA regarding the family's income, expenses, and composition [24 CFR 982.551(b)].

HACSD Policy

The HACSD's procedure for conducting annual recertifications requires recertification through the mail. The HACSD will complete all recertifications at least 30 days prior to the family's anniversary date, unless a delay is caused by a family action or inaction.

The HACSD has established recertification procedures that ensure that the income data provided by families is complete and accurate.

The HACSD will mail recertification forms to the family to complete and return to the office by a due date specified in the notification letter. The HACSD will use the documents to process the annual reexamination.

The family must complete the recertification packet as a condition of continued program participation. All adult family members, 18 years and older, and family members who will turn 18 years of age as of the effective date of the recertification are required to sign the recertification packet.

In the notification letter to the family, the HACSD will include instructions for the family to provide the following:

1. Documentation of income;
2. All forms and releases completed and/or signed and dated by all adult family members;
3. Documentation of assets;
4. Documentation of deductions/allowances;
5. Completed personal declaration form; and
6. Other information, as requested.

Releases and certification altered or amended by the family are unacceptable and would be considered "failure to provide."

Verifications for reexaminations must be less than 120 days old as of the effective recertification date.

If warranted, an HQS inspection will be completed in accordance with the policies in 8-II.C.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (See Chapter 12).

Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].

HACSD Policy

At the annual reexamination, the HACSD will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

If the PHA proposes to terminate assistance based on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the

accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 12.)

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the PHA has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social security numbers
- A person's disability status
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according to the housing quality standards (HQS) (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms [24 CFR 982.403].

11-I.E. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS

[24 CFR 982.552(b)(5)]

Section 327 of Public Law 109-115 established new restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be reexamined along with the income eligibility of the student's parents on an annual basis. In these cases, both the student and the student's parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from their parents or is considered a *vulnerable youth* in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's ongoing eligibility.

Students who reside with parents in an HCV assisted unit are not subject to this provision. It is limited to students who are receiving assistance on their own, separately from their parents.

HACSD Policy

During the annual reexamination process, the PHA will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from their parents or is considered a *vulnerable youth* based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.

If the student is no longer income eligible based on their own income or the income of their parents, the student's assistance will be terminated in accordance with the policies in Section 12-I.D.

If the student continues to be income eligible based on their own income and the income of their parents (if applicable), the HACSD will process a reexamination in accordance with the policies in this chapter.

11-I.F. EFFECTIVE DATES

The PHA must establish policies concerning the effective date of changes that result from an annual reexamination [24 CFR 982.516].

HACSD Policy

An advance notice of a tenant rent *increase* is mailed to the family at least 20 days prior to the scheduled effective date of the rent increase, unless the delay in notification was caused by an action or inaction of the family.

If a 20-day advance notice cannot be issued, the tenant rent increase will be delayed to the following month, unless the delay in notification was caused by an action or inaction of the family.

If there has been a misrepresentation or a material omission by the family, or if the family causes a delay in the reexamination processing, there may be a retroactive rent increase processed and a collection notice issued to the family for overpaid assistance.

An approved contract rent increase, in which the landlord provided proper 60-day notice to the HACSD, will be processed effective the date of the rent increase (even if it must be done retroactively). A contract rent increase will not be approved if the landlord failed to provide proper advance notice to the HACSD.

The HACSD will conduct an interim examination to process a family rent *decrease* upon the family's written request for the interim and submission of the necessary verifications. In conducting the interim, all family information must be reviewed to ensure that the reduction in family rent is correct and reflects all changes in family income and deductions that have taken place since the last examination.

A decrease in tenant rent will be processed in a timely manner. If the family causes a delay in the processing of the tenant rent decrease that results in the reexamination not being completed by the anniversary date, the rent change will be effective on the first day of the month following completion of the reexamination.

If the HACSD is responsible for a delay in processing the tenant rent decrease, the tenant rent decrease may be processed retroactive to the date the decrease should have been effective, and a supplemental payment is generally issued to the owner. In some circumstances, the supplemental payment may be issued to the tenant, as in the case of the tenant no longer residing in the unit.

The notice of rent change is mailed to the owner and the tenant. The HACSD does not require signatures. If the family disagrees with the rent adjustment, it may request an informal review.

PART II: INTERIM REEXAMINATIONS

[24 CFR 982.516]

11-II.A. OVERVIEW

Family circumstances may change between annual reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the PHA must process interim reexaminations to reflect those changes. HUD regulations also permit the PHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB].

In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The PHA must complete the interim reexamination within a reasonable time after the family's request.

This part includes HUD and PHA policies describing what changes families are required to report, what changes families may choose to report, and how the PHA will process both PHA- and family-initiated interim reexaminations.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

The family is required to report all changes in family composition. The PHA must adopt policies prescribing when and under what conditions the family must report changes in income and family composition. However, due to family obligations under the program, the PHA has limited discretion in this area.

HACSD Policy

The income of an additional family member will be included in the family income as applicable under HUD regulations upon HACSD and owner approval of the admission. The HACSD will conduct a full interim reexamination to account for any changes in household composition that occur between annual reexaminations, except for additions due to birth.

New Family Members Not Requiring PHA Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require PHA approval. However, the family is required to promptly notify the PHA of the addition [24 CFR 982.551(h)(2)].

HACSD Policy

The family must inform the HACSD of the birth, adoption, court-awarded custody of a child, minor or disabled children returning to the family, or elderly or disabled dependent within 14 calendar days. Any information, documents or signatures needed from the family in order to verify the change must be provided when requested.

If the family composition is not reported within the required time period, or the family fails to provide documentation or signature, it will be considered untimely reporting. Untimely reporting may result in a termination of assistance, or the family being required to sign a repayment agreement.

New Family and Household Members Requiring Approval

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request PHA approval to add a new family member [24 CFR 982.551(h)(2)] or another household member (live-in aide or foster child) [24 CFR 982.551(h)(4)].

Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.

If a change in family size causes a violation of Housing Quality Standards (HQS) space standards (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

HACSD Policy

The family must obtain HACSD approval of any additional family member prior to that person moving into the assisted unit. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and therefore no longer qualifies as a "guest."

Additions through birth, adoption, return of disabled or minor children to the family, or court-awarded custody do not require prior approval by the HACSD, but the family must report these additions within 14 calendar days.

The HACSD will not approve the addition of a new family or household member unless the individual meets the HACSD's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II). The HACSD will make an exception for additions through marriage or registered domestic partnership, and for elderly or disabled dependents. For instances where a participation prohibition period is not indicated elsewhere in the Plan, the prohibition period is three years, unless the HACSD determines extenuating circumstances.

Participation is always denied to:

- Persons who have been evicted from public housing.

- Persons who have previously violated a family obligation listed in 24 CFR 982.551 of the HUD regulations.

- Persons who were part of a family whose assistance was terminated under the certificate or voucher program for program violations. (Determination will be made on a case-by-case basis depending on the reason for termination.)

- Persons who commit, or have committed, drug-related criminal activity, that use marijuana (including medical or recreational uses), or violent criminal activity as outlined in this Plan. Persons who commit, or have committed, fraud, bribery or any other corrupt or criminal act in connection with any federal housing program, or state or local fraud involving public funds.

- Persons who currently owe rent or other amounts to the HACSD or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

- Persons who have engaged in threatening, abusive or violent behavior toward HACSD personnel or have had a pattern of two or more instances observed by

two or more staff or other witnesses of abusive, vulgar, demeaning, or hostile written or oral language and/or gestures and body movement that denotes an implied threat, excessive hostility, or intimidation.

Persons who have been involved in any criminal activity which may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity.

Persons who have been involved in any criminal activity which may threaten the health or safety of the owner, property management staff, or persons performing a contract administration function or responsibility on behalf of the PHA.

Persons who will overcrowd the unit.

Persons who commit fraud, bribery or any other corrupt or criminal act in connection with any federal housing program.

Except for birth, adoption, court-awarded custody, marriage or registered domestic partnership, return of disabled or minor children to the household, foster children or a live-in aide, or elderly or disabled dependents, the HACSD will not approve the addition of other adults/children to the household during the first 12 months after program admission. Thereafter, other than the exceptions noted above, the HACSD will deny a family's request to add more than a total of two people in a 12-month period. Each non-excepted adult member added to the household must have current income and an income history for the last 6 months, and if employed, is required to be employed at least the equivalent of 20 hours per week at minimum wage (federal) or above for the past 6 months.

An exception to the income requirement may be granted if it would not be feasible to require the person to satisfy the 6-month work requirement. The HACSD may also waive this restriction as a reasonable accommodation to an assisted family member with a disability or offer the family the shared housing option if the family selects a unit that qualifies for shared housing.

In cases where there is no court-awarded custody of a minor child or children due to the absence of the parent or legal guardian of the child and the child is living with the assisted family, the HACSD will apply the preponderance of evidence standard to determine if the family has physical custody of the minor child or children. The HACSD will accept documentation including, but not limited to, school records, public assistance payments and notarized sworn statements that demonstrate that the assisted family has actual physical custody of the minor child or children.

Preponderance of evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not.

Eligible additions cannot be added if the unit will be overcrowded, but the family may transfer to a larger unit.

The HACSD will not approve the addition of a foster child or foster adult if it will cause a violation of HQS space standards. The family may transfer to a larger unit. The family may receive a larger voucher to add permanent foster children/adults in accordance with the subsidy standards.

Live-in aides may not be added if the unit will be overcrowded, but the family may transfer to a larger unit to accommodate the live-in aide. A live-in aide is entitled to a separate bedroom.

If the family does not obtain prior written approval from the HACSD, with the exceptions noted elsewhere, any person the family permits to move in will be considered an unauthorized household member. The family is responsible for full rent for the duration of time the unauthorized person was residing in the unit.

Providing the family is eligible for a larger voucher under the current subsidy standards, the voucher size will be increased if the family is in an appropriately-sized unit or if the family is transferring to an appropriately-sized unit.

If it is determined the unit does not meet HQS because the unit is overcrowded, the family must give notice to move if the family is eligible to move, or the assistance must be terminated within 60 days of the change in household composition that caused the unit to be overcrowded.

In addition, the family must obtain prior written approval from the owner for additions to the household other than by birth, adoption, a minor or disabled child returning to the family, or court-awarded custody. However, the owner may disapprove any additions to the household unless to do so would be a violation of law.

Departure of a Family or Household Member

Families must promptly notify the PHA if any family member no longer lives in the unit [24 CFR 982.551(h)(3)]. Because household members are considered when determining the

family unit (voucher) size [24 CFR 982.402], the PHA also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit.

HACSD Policy

If a family member leaves the household, the family must report this change to the HACSD, in writing, within 14 calendar days of the change and certify whether the member is temporarily or permanently absent.

If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the HACSD within 14 calendar days.

The HACSD will conduct an interim evaluation for changes that affect the total tenant payment in accordance with the interim policy.

When the family notifies the HACSD, it must furnish the following information:

- The date the family member moved out.
- The new address, if known, of the family member.
- A notarized statement as to whether the family member is temporarily or permanently absent.

If it is determined that a reduction in the voucher size is required, the family must be given a minimum of a 60-day notice of intended action, effective the next annual reexamination or as soon as possible thereafter. If an error is discovered that resulted in the voucher size not being reduced at the appropriate time, the voucher size will be reduced with a 60-day notice. The family must be issued and sign a new voucher reflecting the new voucher size.

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.

HACSD Policy

The HACSD may conduct interim reexaminations when families have an increase in income in certain circumstances. Families are required to report all changes of income/assets, in writing within 14 days of the change. The HACSD may, at its discretion, conduct interim reexaminations in the following instances:

For families receiving the Earned Income Disallowance (EID), the HACSD will conduct an interim reexamination at the start and conclusion of the second 50 percent phase-in period of the 24-month eligibility period.

Families with zero or minimal income must submit a statement of income and expenses along with receipts every 30 days. A family with minimal income has monthly income at or below the following level:

Family Size	Minimal Income
1	\$200
2	\$250
3	\$300
4	\$350
5	\$400
6	\$450
7	\$500

Changes reported by participants that do not require an interim will be noted in the file by the staff person, or will be reflected on documents/statements provided by the family. An interim reexamination does not affect the date of the annual recertification.

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 HACSD may 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 becomes available, the HACSD will conduct an interim reexamination.

If it has been determined that a calculation error had occurred, or the calculation was based on incorrect or incomplete information.

There is evidence or a pattern that the family is manipulating the program by a pattern of reducing income just prior to the annual recertification and increasing its income immediately following the annual recertification.

If there is an increase in income less than 90 days after an interim for a decrease in income has been conducted.

If the family includes a person with disabilities, the PHA's decision to terminate the family's assistance is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

HACSD Policy

When the HACSD is terminating assistance, the presence of a disability is considered a mitigating circumstance during the informal review or informal hearing process, if the applicant did not respond to a request by the PHA for information due to a disability.

However, the presence of a disability is never considered a mitigating factor for certain criminal activities (conviction for drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing or a household member subject to a lifetime registration requirement under a State sex offender registration program).

12-II.E. TERMINATIONS RELATED TO DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT OR STALKING

This section describes the protections against termination of assistance that the Violence against Women Act of 2013 (VAWA) provides for victims of domestic violence, dating violence, sexual assault and stalking. For general VAWA requirements, key VAWA definitions, and PHA policies pertaining to notification, documentation, and confidentiality, see section 16-IX of

this plan.

VAWA Protections against Termination

VAWA provides four specific protections against termination of HCV assistance for victims of domestic violence, dating violence, sexual assault or stalking. (*Note:* The second, third, and fourth protections also apply to terminations of tenancy or occupancy by owners participating in the HCV program, as do the limitations discussed under the next heading.)

First, VAWA provides that a PHA may not terminate assistance to a family that moves out of an assisted unit in violation of the lease, with or without prior notification to the PHA, if the move occurred to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault or stalking and who reasonably believed they were imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.354(b)(4)].

Second, it provides that an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking may not be construed either as a serious or repeated lease violation by the victim or as good cause to terminate the assistance of the victim [24 CFR 5.2005(c)(1)].

Third, it provides that criminal activity directly related to domestic violence, dating violence, sexual assault or stalking may not be construed as cause for terminating the assistance of a tenant if a member of the tenant's household, a guest, or another person under the tenant's control is the one engaging in the criminal activity and the tenant or affiliated individual or other individual is the actual or threatened victim of the domestic violence, dating violence, or stalking [24 CFR 5.2005(c)(2)].

Fourth, it gives PHAs the authority to terminate assistance to any tenant or lawful occupant who engages in criminal acts of physical violence against family members or others without terminating assistance to, or otherwise penalizing, the victim of the violence [24 CFR 5.2009(a)].

Limitations on VAWA Protections [24 CFR 5.2005(d) and (e)]

VAWA does not limit the authority of a PHA to terminate the assistance of a victim of abuse for reasons unrelated to domestic violence, dating violence, sexual assault or stalking so long as the PHA does not subject the victim to a more demanding standard than it applies to other program participants [24 CFR 5.2005(d)(1)].

Likewise, VAWA does not limit the authority of a PHA to terminate the assistance of a victim of domestic violence, dating violence, sexual assault or stalking if the PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the assisted property if the victim is not terminated from assistance [24 CFR 5.2005(d)(2)].

HUD regulations define *actual and imminent threat* to mean words, gestures, actions, or other indicators of a physical threat that (a) is real, (b) would occur within an immediate time frame, and (c) could result in death or serious bodily harm [24 CFR 5.2005(d)(2) and (e)]. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:

- The duration of the risk
- The nature and severity of the potential harm
- The likelihood that the potential harm will occur
- The length of time before the potential harm would occur [24 CFR 5.2005(e)]

In order to demonstrate an actual and imminent threat, the PHA must have objective evidence of words, gestures, actions, or other indicators. Even when a victim poses an actual and imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d)(3)].

HACSD Policy

In determining whether a program participant who is a victim of domestic violence, dating violence, sexual assault or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:

Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault or stalking

Whether the threat is a physical danger beyond a speculative threat Whether the threat is likely to happen within an immediate time frame

Whether the threat to other tenants or employees can be eliminated in some other way, such as by helping the victim relocate to a confidential location or seeking a legal remedy to prevent the perpetrator from acting on the threat

If the participant wishes to contest the PHA's determination that they are an actual and imminent threat to other tenants or employees, the participant may do so as part of the informal hearing.

Documentation of Abuse [24 CFR 5.2007]

HACSD Policy

When an individual facing termination of assistance for reasons related to domestic violence, dating violence, sexual assault or stalking claims protection under VAWA, the HACSD will request that the individual provide documentation supporting the claim in accordance with the policies in section 16-IX.D of this plan.

The HACSD reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice. In such cases the PHA will document the waiver in the individual's file.

Terminating the Assistance of a Domestic Violence Perpetrator

Although VAWA provides protection against termination of assistance for victims of domestic violence, it does not provide such protection for perpetrators. VAWA gives the PHA the explicit authority to “terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others” without terminating assistance to “or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant” [24 CFR 5.2009(a)]. This authority is not dependent on a bifurcated lease or other eviction action by an owner against an individual family member. Further, this authority supersedes any local, state, or other federal law to the contrary. However, if the PHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance. This means that the PHA must follow the same rules when terminating assistance to an individual as it would when terminating the assistance of an entire family [3/16/07 *Federal Register* notice on the applicability of VAWA to HUD programs].

If the perpetrator remains in the unit, the PHA continues to pay the owner until the PHA terminates the perpetrator from the program. The PHA must not stop paying HAP until 30 days after the owner bifurcates the lease to evict the perpetrator. The PHA may pay HAP for the full month if the 30-day period will end mid-month [Notice PIH 2017-08].

If the perpetrator is the only participant eligible to receive assistance, the PHA will provide any remaining participant a chance to establish eligibility for the program. If the remaining participant cannot do so, the PHA will provide them with 30 days to establish eligibility for another housing program prior to termination of the HAP contract.

HACSD Policy

The HACSD will terminate assistance to a family member if the PHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the assistance of the remaining, nonculpable family members.

In making its decision, the HACSD will consider all credible evidence, including, but not limited to, a signed certification (form HUD-5382) or other documentation of abuse submitted to the PHA by the victim in accordance with this section and section 16-IX.D. The PHA will also consider the factors in section 12-II.D. Upon such consideration, the PHA may, on a case-by-case basis, choose not to terminate the assistance of the culpable family member.

If the HACSD does terminate the assistance of the culpable family member, it will do so in accordance with applicable law, HUD regulations, and the policies in this plan.

12-II.F. TERMINATION NOTICE

HUD regulations require PHAs to provide written notice of termination of assistance to a family only when the family is entitled to an informal hearing. However, since the family's HAP contract and lease will also terminate when the family's assistance terminates [form HUD- 52641], it is a good business practice to provide written notification to both owner and family anytime assistance will be terminated, whether voluntarily or involuntarily.

HACSD Policy

Whenever a family's assistance will be terminated, the HACSD will send an HACSD written notice of termination to the family and to the owner and advise the participant they will have 14 days from the date of the notice to request an informal hearing.

The notice will contain:

The effective date of the action;

The family's right to request an informal hearing;

The deadline for the family's informal hearing request;

A full explanation of the reasons(s) for termination, including a full description of crimes or actions of the family; and

The sections of the Code of Federal Regulations that provide authority for the termination of assistance.

The HACSD will provide written notice of the contract termination to the owner to coincide with the termination of assistance. The notice to the owner will not include any details regarding the reason for termination of assistance.

The HACSD will also send a form HUD-5382 and form HUD-5380 to the family with the termination notice. The notice will state the date on which the termination will become effective. This date will be at least 30 calendar days following the date of the termination notice, but exceptions will be made whenever HUD rules, other PHA policies, or the circumstances surrounding the termination require.

If a family whose assistance is being terminated is entitled to an informal hearing, the notice of termination that the PHA sends to the family must meet the additional HUD and PHA notice requirements discussed in section 16-III.C of this plan. VAWA 2013 expands notification requirements to require PHAs to provide notice of VAWA rights and the HUD 5382 form when a PHA terminates a household's housing benefits.

HACSD Policy

Whenever the HACSD decides to terminate a family's assistance because of the family's action or failure to act, the PHA will include in its termination notice the VAWA information described in section 16-IX.C of this plan and a form HUD-5382 and form HUD-5380. The HACSD will request that a family member wishing to claim protection under VAWA notify the HACSD, preferably in writing, within 14 business days.

Still other notice requirements apply in two situations:

- If a criminal record is the basis of a family's termination, the PHA must provide a copy of the record to the subject of the record and the tenant so that they have an opportunity to dispute the accuracy and relevance of the record [24 CFR 982.553(d)(2)].
- If immigration status is the basis of a family's termination, as discussed in section 12-I.D, the special notice requirements in section 16-III.D must be followed.

PART III: TERMINATION OF TENANCY BY THE OWNER

12-III.A. OVERVIEW

Termination of an assisted tenancy is a matter between the owner and the family; the PHA is not directly involved. However, the owner is under some constraints when terminating an assisted tenancy. Termination of tenancy for certain reasons will also result in termination of assistance as discussed in this section.

12-III.B. GROUNDS FOR OWNER TERMINATION OF TENANCY

[24 CFR 982.310, 24 CFR 5.2005(c), and Form HUD-52641-A, Tenancy Addendum]

During the term of the lease, the owner is not permitted to terminate the tenancy except for serious or repeated violations of the lease, certain violations of state or local law, or other good cause.

Serious or Repeated Lease Violations

The owner is permitted to terminate the family's tenancy for serious or repeated violations of the terms and conditions of the lease, except when the violations are related to incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking and the victim is protected from eviction by the Violence against Women Act of 2013 (see section 12-II.E). A serious lease violation includes failure to pay rent or other amounts due under the lease.

However, the PHA's failure to make a HAP payment to the owner is not a violation of the lease between the family and the owner.

Violation of Federal, State, or Local Law

The owner is permitted to terminate the tenancy if a family member violates federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

Criminal Activity or Alcohol Abuse

The owner may terminate tenancy during the term of the lease if any *covered person*—meaning any member of the household, a guest, or another person under the tenant's control—commits any of the following types of criminal activity (for applicable definitions see 24 CFR 5.100):

- Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of the premises by, other residents (including property management staff residing on the premises)
- Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of their residences by, persons residing in the immediate vicinity of the premises
- Any violent criminal activity on or near the premises
- Any drug-related criminal activity on or near the premises

However, in the case of criminal activity directly related to domestic violence, dating violence, sexual assault or stalking, if the tenant or an affiliated individual is the victim, the criminal activity may not be construed as cause for terminating the victim's tenancy (see section 12-II.E).

The owner may terminate tenancy during the term of the lease if any member of the household is:

- Fleeing to avoid prosecution, custody, or confinement after conviction for a crime or an

attempt to commit a crime that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or

- Violating a condition of probation or parole imposed under federal or state law.

The owner may terminate tenancy during the term of the lease if any member of the household has engaged in abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Evidence of Criminal Activity

The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person if the owner determines the covered person has engaged in the criminal activity, regardless of whether the covered person has been arrested or convicted for such activity and without satisfying the standard of proof used for a criminal conviction. This is the case except in certain incidents where the criminal activity directly relates to domestic violence, dating violence, sexual assault, or stalking, and the tenant or an affiliated individual is the victim or threatened victim of the domestic violence, dating violence, sexual assault, or stalking.

Other Good Cause

During the initial lease term, the owner may not terminate the tenancy for “other good cause” unless the owner is terminating the tenancy because of something the family did or failed to do. During the initial lease term or during any extension term, other good cause includes the disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises.

After the initial lease term, “other good cause” for termination of tenancy by the owner includes:

- Failure by the family to accept the offer of a new lease or revision
- The owner’s desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit
- A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or desire to lease the unit at a higher rent)

After the initial lease term, the owner may give the family notice at any time, in accordance with the terms of the lease.

If a property is subject to foreclosure, during the term of the lease, the new owner of the property does not have good cause to terminate the tenant’s lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. See Section 13-II.G for a discussion of PHA policies relating to units in foreclosure.

HACSD Policy

The HACSD will not be involved in termination of the lease, nor will it advise the landlord or the tenant regarding the legal process. If the family is eligible to transfer to another unit and requests to move, the HACSD staff will immediately issue a transfer packet to the participant and act to expedite the transfer process.

12-III.C. EVICTION [24 CFR 982.310(e) and (f) and Form HUD-52641-A, Tenancy Addendum]

The owner must give the tenant a written notice that specifies the grounds for termination of tenancy during the term of the lease. The tenancy does not terminate before the owner has given this notice, and the notice must be given at or before commencement of the eviction action.

The notice of grounds may be included in, or may be combined with, any owner eviction notice to the tenant.

Owner eviction notice means a notice to vacate, or a complaint or other initial pleading used under state or local law to commence an eviction action. The owner may only evict the tenant from the unit by instituting a court action. The owner must give the PHA a copy of any eviction notice at the same time the owner notifies the family. The family is also required to give the PHA a copy of any eviction notice (see Chapter 5).

HACSD Policy

The owner should specify lease violations and cite the ways the tenant has violated the lease as documentation for the HACSD's decision regarding termination of assistance.

If the eviction action is finalized in court, the owner must provide the HACSD with documentation related to the eviction, including notice of the eviction (lockout) date, as soon as possible.

Housing assistance payments are paid to the owner under the terms of the HAP contract. If the owner has begun eviction and the family continues to reside in the unit, if the family is eligible for assistance, the HACSD must continue to make housing assistance payments to the owner until the tenant has moved, the owner has obtained a court judgment, or otherwise evicted the tenant. By endorsing the monthly check from the HACSD, the owner certifies that the tenant is still in the unit, the rent is reasonable, and the tenant is in compliance with the contract. Rental assistance cannot be paid if the unit has an HQS violation that is the owner's responsibility.

12-III.D. DECIDING WHETHER TO TERMINATE TENANCY [24 CFR 982.310(h), 24 CFR 982.310(h)(4)]

An owner who has grounds to terminate a tenancy is not required to do so, and may consider all of the circumstances relevant to a particular case before making a decision. These might include:

- The nature of the offending action
- The seriousness of the offending action;
- The effect on the community of the termination, or of the owner's failure to terminate the tenancy;
- The extent of participation by the leaseholder in the offending action;
- The effect of termination of tenancy on household members not involved in the offending activity;
- The demand for assisted housing by families who will adhere to lease responsibilities;
- The extent to which the leaseholder has shown personal responsibility and taken all reasonable steps to prevent or mitigate the offending action;
- The effect of the owner's action on the integrity of the program.

The owner may require a family to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination.

In determining whether to terminate tenancy for illegal use of drugs or alcohol abuse by a household member who is no longer engaged in such behavior, the owner may consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully (42 U.S.C.13661). For this purpose, the owner may require the tenant to submit evidence of the household member's current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

The owner's termination of tenancy actions must be consistent with the fair housing and equal opportunity provisions in 24 CFR 5.105.

An owner's decision to terminate tenancy for incidents related to domestic violence, dating violence, sexual assault or stalking is limited by the Violence against Women Act of 2013 (VAWA) and the conforming regulations in 24 CFR Part 5, Subpart L. (See section 12-II.E.)

HACSD Policy

The owner may request that the HACSD obtain and review criminal or sex-offender registration records for grounds to deny a tenant application or evict a tenant. The HACSD will charge the owner a fee based on the costs incurred by the HACSD, including the costs charged by the law enforcement agency, the HACSD staff time and administrative costs. The owner may not charge the tenant for this fee.

The HACSD **must not** release any criminal information or sex-offender information to the owner, but a Housing Supervisor will review the information and, if no information relevant to application or eviction is found, will notify the owner. If information relevant to the application or eviction is found, the Housing Supervisor will present their findings in writing to the Program Coordinator, who will authorize the findings and sign the letter issued to the owner. The letter will not specify the criminal or sex-offender history but will merely state that there may be cause for denial or eviction of the tenant. If the owner sends documentation that supports the need for specific information for an eviction, the Program Coordinator must approve the release of any information in accordance with the regulations [24 CFR 5.903, 24 CFR 5.905].

12-III.E. EFFECT OF TENANCY TERMINATION ON THE FAMILY'S ASSISTANCE

The term of the HAP contract between the HACSD and the owner is the same as the term of the lease. The HAP contract terminates when the lease terminates, the HACSD terminates program assistance for the family, or when the owner has breach the HAP contract.

The HACSD or the owner may terminate the HAP contract, or the HAP contract terminates upon owner or tenant termination of the lease.

The HACSD may also terminate the contract if funding is no longer available under the HUD Annual Contributions Contract. The contract will terminate automatically 180 days after the last housing assistance payment to the owner.

The HACSD will terminate payments on behalf of the family to the owner upon termination of the HAP contract. The owner must reimburse the HACSD for any subsidies paid after the contract termination.

In most instances, the HACSD will terminate the contract the end of the month following the month the owner is issued a termination notice. However, the contract will terminate the end of the month the family vacates the unit and may terminate the end of the month that serious, life-threatening conditions are noted and not corrected.

If the family continues to occupy the unit after the HAP contract is terminated, the family is responsible for the total amount of rent due to the owner.

After contract termination, if the family meets the criteria for a move with continued assistance, the family may lease another unit.

Family termination of the lease must be in accordance with the terms of the lease. The family may not be eligible to transfer its assistance to another unit, depending on the circumstances of the termination of the lease.

If a termination is not due to a serious or repeated violation of the lease, and if the PHA has no other grounds for termination of assistance, the PHA may issue a new voucher so that the family can move with continued assistance (see Chapter 10).

EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS

Following is a listing of a participant family's obligations under the HCV program:

- The family must supply any information that the PHA or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- The family is responsible for any Housing Quality Standards (HQS) breach by the family caused by failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond normal wear and tear caused by any member of the household or guest.

HACSD Policy

Damages beyond normal wear and tear will be considered to be damages which could be assessed against the security deposit.

- The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.

HACSD Policy

The family must allow the owner access to the premises to make repairs after reasonable notice is given.

- The family must not commit any serious or repeated violation of the lease. HACSD Policy

The HACSD will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner's notice to evict, police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, living or housekeeping habits that cause damage to the unit or premises, and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests. Any incidents of, or criminal activity related to, domestic violence, dating violence, sexual assault or stalking will not be construed as serious or repeated lease violations by the victim [24 CFR 5.2005(c)(1)].

The following criteria will be used to decide if serious or repeated violations of the lease will result in termination of assistance:

If the owner terminates tenancy through court action for serious or repeated violations of the lease;

If it is found the family violated the lease as determined by the following evidence:

Court judgment or settlement between the family and the owner in which the family agrees to vacate the unit and/or pay a settlement amount; or

Police reports, neighborhood complaints, pictures, a HACSD inspection, or other verified third-party information that confirms serious or repeated lease violations; or

Non-payment of rent is always considered a serious violation of the lease.

The participant cannot withhold rent under the program for un-inhabitability since it is a family responsibility under the program (24 CFR 982.515) to pay the family share of the rent.

The HACSD must be notified along with the owner of conditions needing repair in the unit [24 CFR 982.551(b)]; the owner must be given an opportunity to remedy the problems; and the HACSD must be given the opportunity to conduct a special inspection to determine if the unit fails HQS [24 CFR 982.405(g)].

If a unit is reported to have a bedbug infestation, the HACSD will not inspect the unit but will notify the landlord/owner and tenant that the condition fails HQS and must be remedied in a timely manner. The landlord/owner will be responsible for contacting an extermination professional for an immediate inspection. If treatment is needed, it must begin promptly. The landlord/owner must advise the HACSD of the results of the inspection and the treatment plan within 7 days of the failed HQS notice. As the treatment plan may take several weeks to complete, the landlord/owner may be allowed up to 60 days to complete the process and provide verification that it has been completed. Failure to complete the treatment and provide verification may result in abatement of the HAP.

Families in the affected unit must cooperate with the treatment process. If the participant fails to pay rent without permission of the HACSD, the participant's non-payment of rent will be considered a serious lease violation and violation of a family responsibility.

It will always be considered a serious lease violation if the participant causes the landlord to incur expenses for cleaning and/or damages which exceed the amount of the security deposit paid to the owner at the beginning of tenancy, or \$500 if no security deposit was paid. The damages must be verified by a preponderance of evidence supported by an independent expert's cost estimate or photographs taken by HACSD staff. HACSD photographs of an obviously dirty unit, or damages above wear and tear, or debris left in or around the unit may be considered a serious lease violation. If the participant does not make full restitution, the participant may not transfer to another unit and will be issued a notice of termination of program participation.

If the participant has already moved into a new unit when a full determination of damages by HACSD staff occurs or it is determined that the tenant has an unpaid balance for rent or utilities, the tenant will be issued a notice of termination of program participation.

With the exception of a unit being "red tagged" as being uninhabitable by a governmental entity, the family may not move during the term of the lease without the owner's and the HACSD's permission.

The participant cannot move during the term of the lease, even if the participant claims uninhabitability, as the HACSD must be notified along with the owner of the problems in the unit; the owner must be given an opportunity to remedy the problems; and the HACSD must be given the opportunity to conduct a special inspection to determine if the unit fails HQS (24 CFR 982.406). If the participant abandons the unit during the term of the lease without permission of the HACSD, the participant's action will be considered a violation of a family obligation under 24 CFR 982.551(b), (e), and (f), and a serious lease violation and a termination notice will be issued.

- The family must notify the PHA and the owner before moving out of the unit or terminating the lease.

HACSD Policy

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to the HACSD at the same time the owner is notified.

- The family must promptly give the PHA a copy of any owner eviction notice.
- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

HACSD Policy

The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The HACSD will determine eligibility of the new member in accordance with the policies in Chapter 3.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- If the PHA has given approval, a foster child or a live-in aide may reside in the unit. The PHA has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied. For policies related to the request and approval/disapproval of foster children, foster adults, and live-in aides, see Chapter 3 (Sections I.K and I.M), and Chapter 11 (Section II.B).
- The family must not sublease the unit, assign the lease, or transfer the unit.

HACSD Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by the PHA to verify that the family is living in the unit or information related to family absence from the unit.
- The family must promptly notify the PHA when the family is absent from the unit.

HACSD Policy

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater

than 14 calendar days. Written notice must be provided to the HACSD at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space).
- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).

HACSD Policy

The household must notify the HACSD in writing within 14 days of occurrence if any family member is arrested for any drug-related criminal activity, violent criminal activity, or other criminal activity on or near the premises even if the arrest does not result in a conviction.

- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.
- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for a discussion of HUD and PHA policies related to alcohol abuse.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

Chapter 13 - OWNERS

INTRODUCTION

Owners play a major role in the HCV program by supplying decent, safe, and sanitary housing for participating families.

The term “owner” refers to any person or entity with the legal right to lease or sublease a unit to a participant in the HCV program [24 CFR 982.4(b)]. The term “owner” includes a principal or other interested party [24 CFR 982.453; 24 CFR 982.306(f)], such as a designated agent of the owner.

Owners have numerous responsibilities under the program, including screening and leasing to families, maintaining the dwelling unit, enforcing the lease, and complying with various contractual obligations.

The chapter is organized in two parts:

Part I: Owners in the HCV Program. This part discusses the role of an owner in PHA’s HCV program and highlights key owner rights and responsibilities.

Part II: HAP Contracts. This part explains provisions of the HAP contract and the relationship between the PHA and the owner as expressed in the HAP contract.

PART I. OWNERS IN THE HCV PROGRAM

13-I.A. OWNER RECRUITMENT AND RETENTION [HCV GB; HCV Landlord Strategy Guidebook for PHAs]

Recruitment

PHAs are responsible for ensuring that very low-income families have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in the PHA's jurisdiction, are willing to participate in the HCV program.

To accomplish this objective, PHAs must identify and recruit new owners to participate in the program.

If the PHA will be conducting outreach events, the PHA must ensure that notices and communications during outreach events are provided in a manner that is effective for persons with hearing, visual, and other communications-related disabilities. PHAs must also take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency.

Retention

In addition to recruiting owners to participate in the HCV program, the PHA must also provide the kind of customer service that will encourage participating owners to remain active in the program.

HACSD Policy

All HACSD activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners.

The HACSD will provide owners with a handbook that explains the program, including HUD and PHA policies and procedures, in easy-to-understand language.

The HACSD will give special attention to helping new owners succeed through activities such as:

- Providing information to owners of applicable legislative changes in program requirements.

- Encouraging owners of decent, safe and sanitary housing units to lease to Section 8 families.

- Promoting participation by owners of suitable units located outside areas of high poverty or minority concentration.

- Conducting periodic meetings with owners, upon request, to improve owner relations and to recruit new owners.

- Initiating personal contact with private property owners and managers by telephone, or, upon request, at informal discussions and meetings.

- Offering printed materials to inform owners and managers of the opportunities available under the program.

- Actively participating in community-based organizations comprised of private property and apartment owners and managers.

The HACSD may periodically:

- Develop working relationships with owners and real estate broker associations.

- Establish contact with civic, charitable and neighborhood organization, and public agencies which have an interest in housing for low-income.

- Provide the owner with a designated HACSD contact person.

- Coordinate inspection and leasing activities between the PHA, the owner, and the family.

- Initiate telephone contact with the owner to explain the inspection process and providing an inspection booklet and other resource materials about HUD housing quality standards.

- Provide other written information about how the program operates, including answers to frequently asked questions.

Additional services may be undertaken on an as-needed basis, and as resources permit.

13-I.B. BASIC HCV PROGRAM REQUIREMENTS

HUD requires the PHA to assist families in their housing search by providing the family with a list of landlords or other parties known to the PHA who may be willing to lease a unit to the family, or to help the family find a unit. Although the PHA cannot maintain a list of owners that are pre-qualified to participate in the program, owners may indicate to the PHA their willingness to lease a unit to an eligible HCV family, or to help the HCV family find a unit [24 CFR 982.301(b)(11)].

HACSD Policy

Owners that wish to indicate their willingness to lease a unit to an eligible HCV family or to help the HCV family find a unit must notify the HACSD. The PHA will maintain a listing of such owners and provide this listing to the HCV family as part of the informational briefing packet. The list may include, if available, landlords willing to lease units or agencies able to help families find units outside areas of poverty or minority concentration.

When a family approaches an owner to apply for tenancy, the owner is responsible for screening the family and deciding whether to lease to the family, just as the owner would with any potential unassisted tenant. The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy. See chapters 3 and 9 for more detail on tenant family screening policies and process.

If the owner is willing, the family and the owner must jointly complete a Request for Tenancy Approval (RFTA, Form HUD 52517), which constitutes the family's request for assistance in the specified unit, and which documents the owner's willingness to lease to the family and to follow the program's requirements. When submitted to the PHA, this document is the first step in the process of obtaining approval for the family to receive the financial assistance it will need in order to occupy the unit. Also submitted with the RFTA is a copy of the owner's proposed dwelling lease, including the HUD-required Tenancy Addendum (Form HUD-52641-A). See Chapter 9 for more detail on request for tenancy approval policies and process.

HUD regulations stipulate requirements for the approval of an assisted tenancy.

The owner must be qualified to participate in the program [24 CFR 982.306]. Some owners are precluded from participating in the program, or from renting to a particular family, either because

of their past history with this or another federal housing program, or because of certain conflicts of interest. Owner qualifications are discussed later in this chapter.

The selected unit must be of a type that is eligible for the program [24 CFR 982.305(a)]. Certain types of dwelling units cannot be assisted under the HCV program. Other types may be assisted under certain conditions. See chapter 9 for more detail on unit eligibility policies and process.

The selected unit must meet HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD [24 CFR 982.305(a)]. The PHA will inspect the owner's dwelling unit at least annually to ensure that the unit continues to meet HQS requirements. See chapter 8 for a discussion of the HQS standards and policies for HQS inspections at initial lease-up and throughout the family's tenancy.

The PHA must determine that the proposed rent for the unit is reasonable [24 CFR 982.305(a)]. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises. See chapter 8 for a discussion of requirements and policies on rent reasonableness, rent comparability and the rent reasonableness determination process.

At initial lease-up of a unit, if the gross rent exceeds the applicable payment standard, the PHA must ensure that the family share does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]. See chapter 6 for a discussion of the calculation of family income, family share of rent and HAP.

The dwelling lease must comply with all program requirements [24 CFR 982.308]. Owners are encouraged to use their standard leases when renting to an assisted family. The HUD Tenancy Addendum includes the HUD requirements governing the tenancy and must be added word-for-word to the owner's lease. See chapter 9 for a discussion of the dwelling lease and tenancy addendum, including lease terms and provisions.

The PHA and the owner must execute a Housing Assistance Payment (HAP) Contract (Form HUD-52641). The HAP contract format is prescribed by HUD. See chapter 9 for a discussion of the HUD requirements for execution of the HAP contract.

13-I.C. OWNER RESPONSIBILITIES [24 CFR 982.452]

The basic owner responsibilities in the HCV program are outlined in the regulations as follows:

- Complying with all of the owner's obligations under the housing assistance payments (HAP) contract and the lease
- Performing all management and rental functions for the assisted unit, including selecting a voucher-holder to lease the unit, and deciding if the family is suitable for tenancy of the unit
- Maintaining the unit in accordance with the Housing Quality Standards (HQS), including performance of ordinary and extraordinary maintenance
- Complying with equal opportunity requirements
- Preparing and furnishing to the PHA information required under the HAP contract
- Collecting the security deposit, the tenant rent, and any charges for unit damage by the family.
- Enforcing tenant obligations under the dwelling lease
- Paying for utilities and services that are not the responsibility of the family as specified in the lease

- Allowing reasonable modifications to a dwelling unit occupied or to be occupied by a disabled person [24 CFR 100.203]
- Complying with the Violence against Women Reauthorization Act of 2013 (VAWA) when screening prospective HCV tenants or terminating the tenancy of an HCV family [24 CFR Part 5, Subpart L; 24 CFR 982.310(h)(4); and 24 CFR 982.452(b)(1)]

13-I.D. OWNER QUALIFICATIONS

The PHA does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where the PHA may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. No owner has a right to participate in the HCV program [24 CFR 982.306(e)].

Owners Barred from Participation [24 CFR 982.306(a) and (b)]

The PHA must not approve the assisted tenancy if the PHA has been informed that the owner has been debarred, suspended, or subject to a limited denial of participation under 24 CFR part 24.

HUD may direct the PHA not to approve a tenancy request if a court or administrative agency has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirements, or if such an action is pending.

Leasing to Relatives [24 CFR 982.306(d), HCV GB]

The PHA must not approve a tenancy if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family. The PHA may make an exception as a reasonable accommodation for a family member with a disability. The owner is required to certify that no such relationship exists. This restriction applies at the time that the family receives assistance under the HCV program for occupancy of a particular unit. Current contracts on behalf of owners and families that are related may continue, but any new leases or contracts for these families may not be approved.

HACSD Policy

Unless the lease was effective prior to June 17, 1998, the family may not lease properties owned by a parent, child, grandparent, grandchild, sister or brother of any family member. The HACSD will waive this restriction upon verification of the need for reasonable accommodation for a family member who is a person with a disability.

Conflict of Interest [24 CFR 982.161; HCV GB p. 8-19; Form HUD-52641-Section 13]

The PHA must not approve a tenancy in which any of the following classes of persons has any interest, direct or indirect, during tenure or for one year thereafter:

- Any present or former member or officer of the PHA (except a participant commissioner)
- Any employee of the PHA, or any contractor, subcontractor or agent of the PHA, who formulates policy or who influences decisions with respect to the programs
- Any public official, member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs
- Any member of the Congress of the United States

Such “covered individual” may not have any direct or indirect interest in the HAP contract or in any benefits or payments under the contract (including the interest of an immediate family member of such covered individual) while such person is a covered individual or for one year

thereafter.

Immediate family member means the spouse, parent (including a stepparent), child (including a stepchild), grandparent, grandchild, sister, or brother (including a stepsister or stepbrother) of any covered individual.

HUD may waive the conflict-of-interest requirements, except for members of Congress, for good cause. The PHA must submit a waiver request to the appropriate HUD Field Office for determination.

Any waiver request submitted by the PHA must include the following [HCV Guidebook]:

- Complete statement of the facts of the case;
- Analysis of the specific conflict of interest provision of the HAP contract and justification as to why the provision should be waived;
- Analysis of and statement of consistency with state and local laws. The local HUD office, the PHA, or both parties may conduct this analysis. Where appropriate, an opinion by the state's attorney general should be obtained;
- Opinion by the local HUD office as to whether there would be an appearance of impropriety if the waiver were granted;
- Statement regarding alternative existing housing available for lease under the HCV program or other assisted housing if the waiver is denied;
- If the case involves a hardship for a particular family, statement of the circumstances and discussion of possible alternatives;
- If the case involves a public official or member of the governing body, explanation of their duties under state or local law, including reference to any responsibilities involving the HCV program;
- If the case involves employment of a family member by the PHA or assistance under the HCV program for an eligible PHA employee, explanation of the responsibilities and duties of the position, including any related to the HCV program;
- If the case involves an investment on the part of a member, officer, or employee of the PHA, description of the nature of the investment, including disclosure/divestiture plans.

Where the PHA has requested a conflict of interest waiver, the PHA may not execute the HAP contract until HUD has made a decision on the waiver request.

Owner Actions That May Result in Disapproval of a Tenancy Request [24 CFR 982.306(c)]

HUD regulations permit the PHA to disapprove a request for tenancy for various actions and inactions of the owner.

If the PHA disapproves a request for tenancy because an owner is not qualified, it may not terminate the HAP contract for any assisted families that are already living in the owner's properties unless the owner has violated the HAP contract for those units [HCV GB].

HACSD Policy

The HACSD will refuse to approve a request for tenancy if the HACSD becomes aware that any of the following are true:

HUD, or another agency, has notified the HACSD in writing that the owner has been disbarred, suspended, or subject to a limited denial of participation under 24 CFR part 24.

The HACSD has debarred the owner by providing a notice to the owner, that is signed by the Chief or HACSD Deputy Director, notifying the owner that the owner is debarred from program participation, the debarment period, the address of the property or properties, and the reasons for debarment which may include: abusive or threatening verbal or physical behavior towards HACSD personnel or program participants, safety concerns at the property or properties, or serious or repeated HAP contract violations.

HUD has notified the HACSD in writing that the federal government has instituted an administrative or judicial action against the owner for violation of the Fair Housing Act, or another federal equal opportunity requirement, and such action is pending.

HUD or any other federal, state, or local agency has notified the HACSD in writing that a court or administrative agency has determined that the owner has violated the Fair Housing Act or other federal equal opportunity requirements.

Unless the lease was effective prior to June 17, 1998, the owner may not be a parent, child, grandparent, grandchild, sister or brother of any family member. The HACSD will waive this restriction as a reasonable accommodation for a family member who is a person with a disability and who provides documentation of a clear and compelling need for the accommodation.

In cases where the owner and tenant bear the same last name, the HACSD may, at its discretion, require the family and/or owner to certify whether they are related to each other in any way.

The HACSD will not issue a payment to the owner at the participant's address with the exception of some special housing types.

In cases where the payment is mailed to a post office box, and there is a question regarding the relationship between the owner and the tenant, the HACSD may submit a post office request to confirm the owner's physical address.

Owner Restrictions and Penalties

If an owner has committed fraud or abuse, is guilty of frequent or serious contract violations, has not addressed safety concerns at the properties, or the owner or management has engaged in abusive or threatening physical or verbal behavior against HACSD personnel or program participants, the HACSD may restrict the owner from future participation in the program for a period of time commensurate with the seriousness of the offense. The HACSD may also terminate some or all contracts with the owner.

Before imposing any penalty against an owner, the HACSD will review all relevant factors pertaining to the case, and will consider such factors as the owner's record of compliance, the seriousness of the violations, and the number of violations. If debarment and/or penalty are warranted, the owner will be notified in writing by the Chief or HACSD Deputy Director of the reason for debarment/penalty, the debarment period or the penalty amount, and the reasons for the debarment/penalty.

Chapter 15 SPECIAL HOUSING TYPES

[24 CFR 982 Subpart M; New HCV GB, *Special Housing Types*]

INTRODUCTION

The PHA may permit a family to use any of the special housing types discussed in this chapter. However, the PHA is not required to permit families receiving assistance in its jurisdiction to use these housing types, except that PHAs must permit use of any special housing type if needed as a reasonable accommodation for a person with a disability. The PHA also may limit the number of families who receive HCV assistance in these housing types and cannot require families to use a particular housing type. No special funding is provided for special housing types.

Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601]. A single unit cannot be designated as more than one type of special housing. The PHA cannot give preference to households that wish to live in any of these types of housing and cannot require households to select any of these types of housing [New HCV GB, *Special Housing Types*, p.3].

HACSD Policy

Families will be permitted to utilize the special housing types as outlined in this chapter, unless otherwise specified.

This chapter consists of the following seven parts. Each part contains a description of the housing type and any special requirements associated with it. Except as modified by this chapter, the general requirements of the HCV program apply to special housing types.

Part I: Single Room Occupancy

Part II: Congregate Housing

Part III: Group Homes

Part IV: Shared Housing

Part V: Cooperative Housing

Part VI: Manufactured Homes (including manufactured home space rental)

Part VII: Homeownership

PART I: SINGLE ROOM OCCUPANCY

[24 CFR 982.602 through 982.605]

15-I.A. OVERVIEW

A single room occupancy (SRO) unit provides living and sleeping space for the exclusive use of the occupant but requires the occupant to share sanitary and/or food preparation facilities with others. More than one person may not occupy an SRO unit. HCV regulations do not limit the number of units in an SRO facility, but the size of a facility may be limited by local ordinances.

When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Single room occupancy (SRO) housing."

15-I.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The HACSD SRO payment standard is 75 percent of the zero-bedroom payment standard. For a person residing in an exception area, the payment standard is 75 percent of the HUD-approved zero-bedroom exception payment standard amount. For all SRO housing, the SRO payment standard must be used to calculate the housing assistance payment.

The rent must be rent reasonable in accordance with the rent reasonableness policies in this Plan.

The utility allowance for an assisted person residing in SRO housing is 75 percent of the zero-bedroom utility allowance.

The HAP for an assisted occupant in an SRO facility is the lower of the SRO payment standard amount minus the TTP or the gross rent for the unit minus the TTP.

15-I.C. HOUSING QUALITY STANDARDS (HQS)

HQS requirements described in Chapter 8 apply to SRO housing except that sanitary facilities and space and security characteristics must meet local code standards for SRO housing. In the absence of applicable local code standards for SRO housing, the following standards apply:

- **Access:** Access doors to the SRO unit must have working locks for privacy. The occupant must be able to access the unit without going through any other unit. Each unit must have immediate access to two or more approved means of exit from the building, appropriately marked and leading to safe and open space at ground level. The SRO unit must also have any other means of exit required by State or local law.
- **Fire Safety:** All SRO facilities must have a sprinkler system that protects major spaces. "Major spaces" are defined as hallways, large common areas, and any other areas specified in local fire, building, or safety codes. SROs must also have hard-wired smoke detectors, and any other fire and safety equipment required by state or local law.

Sanitary facilities and space and security standards must meet local code requirements for SRO housing. In the absence of local code standards, the requirements discussed below apply [24 CFR 982.605].

- **Sanitary Facilities:** At least one flush toilet that can be used in privacy, a lavatory basin, and a bathtub or shower in proper operating condition must be provided for each six persons (or fewer) residing in the SRO facility. If the SRO units are leased only to males, flush urinals

may be substituted for up to one half of the required number of toilets. Sanitary facilities must be reasonably accessible from a common hall or passageway to all persons sharing them, and may not be located more than one floor above or below the SRO unit. They may not be located below grade unless the SRO units are located on that level.

- **Space and Security:** An SRO unit must contain at least 110 square feet of floor space, and at least four square feet of closet space with an unobstructed height of at least five feet, for use by the occupant. If the closet space is less than four square feet, the habitable floor space in the SRO unit must be increased by the amount of the deficiency. Exterior doors and windows accessible from outside the SRO unit must be lockable.

Because no children live in SRO housing, the housing quality standards applicable to lead- based paint do not apply.

PART II: CONGREGATE HOUSING

[24 CFR 982.606 through 982.609; Form HUD-52641; [New HCV GB, Special Housing Types, p. 6](#)]

15-II.A. OVERVIEW

Congregate housing is intended for use by elderly persons or persons with disabilities. Other families are not eligible for this special housing type. A congregate housing facility contains a shared central kitchen and dining area and a private living area for the individual household that includes at least a living room, bedroom and bathroom.

Food service for residents must be provided.

HACSD Policy

The HACSD may approve a family member or live-in aide to reside with the elderly person or person with disabilities.

The HACSD will approve a live-in aide if needed, for an elderly person, or as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Congregate housing."

The HACSD will approve applications for congregate housing on a case-by-case basis. The HACSD may require the names of the unassisted household members, and may not approve the application for congregate housing if it is determined the living arrangement may result in a circumvention of the program regulations, such as in the case of unassisted household members who were barred from program participation.

If there is a live-in aide, the live-in aide will be counted in determining the family unit size.

15-II.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area for the assisted family. If there is only one room in the unit (not including the bathroom or the kitchen, if a kitchen is provided), the PHA must use the payment standard for a zero-bedroom unit. If the unit has two or more rooms (other than the bathroom and the kitchen), the PHA must use the one-bedroom payment standard.

The HAP for an assisted occupant in a congregate housing facility is the lower of the applicable payment standard minus the TTP or the gross rent for the unit minus the TTP.

The gross rent for the unit for the purpose of calculating HCV assistance is the shelter portion (including utilities) of the resident's monthly housing expense only. The residents' costs for food service should not be included in the rent for a congregate housing unit.

The rent must be rent reasonable in accordance with the rent reasonableness policies in this Plan.

15-II.C. HOUSING QUALITY STANDARDS

HQS requirements as described in Chapter 8 apply to congregate housing except for the requirements stated below.

Congregate housing must have a refrigerator of appropriate size in the private living area of each resident, a central kitchen and dining facilities located within the premises and accessible to the residents, and food service for the residents, that is not provided by the residents themselves.

The congregate housing must contain adequate facilities and services for the sanitary disposal of food waste and refuse, including facilities for temporary storage where necessary.

The housing quality standards applicable to lead-based paint do not apply unless a child under that age of six is expected to reside in the unit.

PART III: GROUP HOME

[24 CFR 982.610 through 982.614; Form HUD-52641; [New HCV GB, Special Housing Types](#), p. 8]

15-III.A. OVERVIEW

A group home is a state-approved (licensed, certified, or otherwise approved in writing by the state) facility intended for occupancy by elderly persons and/or persons with disabilities. Except for live-in aides, all persons living in a group home, whether assisted or not, must be elderly persons or persons with disabilities. Persons living in a group home must not require continuous medical or nursing care.

HACSD Policy

The HACSD will not approve assistance for a person to live in a group home if documentation indicates that the person needs continual medical or nursing care.

A group home consists of bedrooms for residents, which can be shared by no more than two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents.

No more than 12 persons may reside in a group home including assisted and unassisted residents and any live-in aides.

If approved by the HACSD, a live-in aide may reside with a person with disabilities. Other persons are not eligible to reside with the participant. The PHA must approve a live-in aide, if needed for an elderly person or as a reasonable accommodation, so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family. The standard form of the HAP contract is used (form HUD-62641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Group home."

15-III.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

Unless there is a live-in aide, the family unit size (voucher size) for an assisted occupant of a group home must be zero- or one-bedroom. If there is a live-in aide, the aide must be counted in determining the household's unit size.

The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the pro-rata share of the payment standard on the HACSD payment standards schedule for the group home size. The pro-rata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home. The number of persons in the assisted household equals one assisted person plus any PHA-approved live-in aide.

The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.

The utility allowance for each assisted occupant in a group home is the pro-rata share of the family unit size to the utility allowance for the group home.

The rents paid for participants residing in group homes must be reasonable in accordance with the rent reasonableness policies in the Plan. The rent for an assisted person must not exceed the pro-rata portion of the reasonable rent for the group home. In determining reasonable rent, the

PHA must consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.

15-III.C. HOUSING QUALITY STANDARDS

The entire unit must comply with HQS requirements described in Chapter 8, except for the requirements stated below.

- **Sanitary Facilities:** A group home must have at least one bathroom in the facility, with a flush toilet that can be used in privacy, a fixed basin with hot and cold running water, and a shower or bathtub with hot and cold running water. A group home may contain private or common bathrooms. However, no more than four residents can be required to share a bathroom.
- **Food Preparation and Service:** Group home units must contain a kitchen and dining area with adequate space to store, prepare, and serve food. The facilities for food preparation and service may be private or may be shared by the residents. The kitchen must contain a range, an oven, a refrigerator, and a sink with hot and cold running water. The sink must drain into an approvable public or private disposal system.
- **Space and Security:** Group homes must contain at least one bedroom of appropriate size for every two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents. Doors and windows accessible from outside the unit must be lockable.
- **Structure and Material:** To avoid any threat to the health and safety of the residents, group homes must be structurally sound. Elevators must be in good condition. Group homes must be accessible to and usable by residents with disabilities.
- **Site and Neighborhood:** Group homes must be located in a residential setting. The site and neighborhood should be reasonably free from disturbing noises and reverberations, and other hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:
 - Dangerous walks or steps
 - Smoke or dust
 - Instability
 - Excessive noise
 - Flooding, poor drainage
 - Vibrations or vehicular traffic
 - Septic tank back-ups
 - Excessive accumulations of trash
 - Sewage hazards
 - Vermin or rodent infestation, and
 - Mud slides
 - Fire hazards.
 - Abnormal air pollution

The housing quality standards applicable to lead-based paint do not apply unless a child under the age of six is expected to reside in the unit.

PART IV: SHARED HOUSING

[24 CFR 982.615 through 982.618; Form HUD-52641; Notice PIH 2021-05; New HCV GB, [Special Housing Types](#), p. 11]

15-IV.A. OVERVIEW

Families in markets with tight rental conditions or with a prevalence of single-family housing may determine a shared housing living arrangement to be a useful way to secure affordable housing. PHAs offering shared housing as a housing solution may also experience some reduction in the average per-unit cost (PUC) paid on behalf of assisted families.

Shared housing is a single housing unit occupied by an assisted family and another resident or residents. The unit may be a house or an apartment. The shared unit consists of both common space for use by the occupants of the unit and separate private space for each assisted family.

An assisted family may share a unit with other persons assisted under the HCV program or with other unassisted persons.

Shared housing may be offered in a number of ways, including for-profit co-living (such as a boarding house, single bedroom with a common living room/kitchen/dining room) run by a private company [Notice PIH 2021-05].

The owner of a shared housing unit may reside in the unit, but housing assistance may not be paid on behalf of the owner. The resident owner may not be related by blood or marriage to the assisted family.

If approved by the HACSD, a live-in aide may reside with the family to care for a person with disabilities. The HACSD must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: "This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Shared housing."

HACSD Policy

A resident owner of a shared housing unit may enter into a HAP contract with the HACSD.

A live-in aide may not be an owner.

The HACSD will approve applications for shared housing on a case-by-case basis. The HACSD may require the names of the unassisted household members, and will not approve the application for shared housing if it is determined the living arrangement may result in a circumvention of the program regulations, such as in the case of unassisted household members who were barred from program participation for violations of the program.

15-IV.B. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard for a family in shared housing is the lower of the payment standard amount on the PHA payment standards schedule for the family unit size (voucher size) or the pro-rata share of the payment standard for the shared housing unit size.

If the PHA approves a live-in aide, the live-in aide will be counted in determining the family unit size. The live-in aide may never be the owner of the assisted unit.

The pro-rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private, non-shared space by the total number of bedrooms in the unit.

Example: Rent Prorata

The family decides to rent 3 bedrooms of a 5-bedroom unit. The ratio would be $\frac{3}{5}$ or .6

The rent for the five-bedroom housing is \$1500

The assisted family's contract rent is \$900 $[(1500 \times .6) \text{ or } (1500 \div 5 = \$300 \text{ per bedroom}) \times 3]$

Example: A family holds a 2-bedroom voucher.

Shared housing unit size: bedrooms available to assisted family =2

Total bedrooms in the unit: 3

2 Bedrooms for assisted family \div 3 Bedrooms in the unit = .667 pro-rata share

2 Bedroom payment standard : \$1200

3 Bedroom payment standard: \$1695. $\$1695 \times .667$ (pro-rata share) = \$1131. \$1131 is lower than the \$1200 payment standard for the 2 Bedroom family unit size.

\$1131 is the payment standard used to calculate the HAP.

The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP.

The utility allowance for an assisted family living in shared housing is the pro-rata share of the utility allowance for the shared housing unit.

Example: A family holds a 2-bedroom voucher. The family decides to occupy 3 out of 4 bedrooms available in the unit.

The utility allowance for a 4-bedroom unit equals \$200 The utility allowance for a 2-bedroom unit equals \$100

The prorata share of the utility allowance is \$150 ($\frac{3}{4}$ of \$200)

The PHA will use the 2-bedroom utility allowance of \$100.

The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit..

If the family is renting a room or rooms from a resident owner, the rent for the rooms must be rent reasonable. The rents on comparable rooms for rent must be reviewed, as well as the pro-rated reasonable rent for a like unit.

In determining reasonable rent, the PHA may consider whether sanitary and food preparation areas are private or shared.

15-IV.C. HOUSING QUALITY STANDARDS

The PHA will ensure that all share housing units approved for the program are in compliance with all of the Housing quality Standards for shared housing, as regulated in 24 CF 982.618. The PHA may not give approval to reside in shared housing unless the entire unit, including the portion of the unit available for use by the assisted family under its lease, meets the housing quality standards.

HQS requirements described in Chapter 8 apply to shared housing except for the requirements stated below.

- ***Facilities Available for the Family:*** Facilities available to the assisted family, whether shared or private, must include a living room, a bathroom, and food preparation and refuse disposal facilities.
- ***Space and Security:*** The entire unit must provide adequate space and security for all assisted and unassisted residents. The private space for each assisted family must contain at least one bedroom for each two persons in the family. The number of bedrooms in the private space of an assisted family must not be less than the family unit size (voucher size). A zero-bedroom or one-bedroom unit may not be used for shared housing. Alternate sleeping areas will not be considered in shared housing.

PART V: COOPERATIVE HOUSING

[24 CFR 982.619; New HCV GB, [Special Housing Types](#), p. 14]

15-V.A. OVERVIEW

This part applies to rental assistance for a cooperative member residing in cooperative housing. It does not apply to assistance for a cooperative member who has purchased membership under the HCV homeownership option, or to rental assistance for a family that leases a cooperative housing unit from a cooperative member.

A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged “rent” a cooperative member is charged a “carrying charge.” The monthly carrying charge includes the member’s share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. It does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.

The occupancy agreement or lease and other appropriate documents must provide that the monthly carrying charge is subject to Section 8 limitations on rent to owner, and the rent must be reasonable as compared to comparable unassisted units.

When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Cooperative housing.”

HACSD Policy

The HACSD will approve a family living in cooperative housing if it is determined that assistance under the program will help maintain affordability of the cooperative unit for low-income families. The HACSD will not approve assistance for a family in cooperative housing until the HACSD has also determined that the cooperative has adopted requirements to maintain continued affordability for low-income families after transfer of a cooperative member’s interest in a cooperative unit (such as a sale of the resident’s share in a cooperative corporation).

15-V.B. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard and utility allowance are determined according to regular HCV program requirements.

The reasonable rent in cooperative housing is determined in accordance with the HCV regulations in this Plan. For cooperative housing, the rent to owner is the monthly carrying charge under the occupancy agreement/lease between the member and the cooperative.

The HAP for a cooperative housing unit is the lower of the payment standard minus the TTP or the gross rent (monthly carrying charge for the unit, plus any utility allowance), minus the TTP. The carrying charge consists of the amount assessed to the member by the cooperative for occupancy of the housing. It includes the member’s share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. However, the carrying charge does not include down payments or other payments to purchase the cooperative unit, or to amortize a loan to the family for this purpose. Gross rent is the carrying charge, plus any utility.

For a cooperative, rent adjustments are applied to the carrying charge similarly to regular HCV rent adjustments described in the rent Chapter 8 of this Plan.

The lease and other appropriate documents will stipulate that the monthly carrying charge is subject to HCV limitations on rent to owner. The HAP will be determined in accordance with the standard HCV guidelines in this Plan.

HACSD Policy

The HACSD may approve a live-in aide to reside with the family to care for an elderly or near elderly person, or person with disabilities. The HACSD will approve a live-in aide if needed as a reasonable accommodation, so that the program is readily accessible to and usable by persons with disabilities. If the HACSD approves a live-in aide, the live-in aide will be counted when determining the family unit size.

15-V.C. HOUSING QUALITY STANDARDS

All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements. The PHA remedies described in 24 CFR 982.404 do not apply. Rather, if the unit and premises are not maintained in accordance with HQS, the PHA may exercise all available remedies regardless of whether the family or cooperative is responsible for the breach of HQS.

No housing assistance payment can be made unless the unit meets HQS and the defect is corrected within the period as specified by the PHA and the PHA verifies the correction (see Chapter 8).

In addition to regular breaches of HQS, breaches of HQS by the family include failure to perform any maintenance for which the family is responsible in accordance with the terms of the cooperative occupancy agreement [HCV GB].

PART VI: MANUFACTURED HOMES

[24 CFR 982.620 through 982.624; FR Notice 1/18/17; New HCV GB, [Special Housing Types](#), p. 15]]

15-VI.A. OVERVIEW

A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV- assisted families may occupy manufactured homes in two different ways.

- 1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.
- 2) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families.

HACSD Policy

The HACSD will permit a family to lease a manufactured home and space with assistance under the program just as a house or apartment may be leased. The HACSD will provide assistance for a family that owns the manufactured home and leases only the space.

The HACSD may approve a live-in aide to reside with a family to care for an elderly or near elderly person, or a person with disabilities. The HACSD will approve a live-in aide if needed as a reasonable accommodation, so the program is accessible to and usable by persons with disabilities. If the HACSD approves a live-in aide, the live-in aide must be counted when determining the family unit size. A live-in aide may never be an owner of the manufactured home or the park.

15-VI.B. SPECIAL REQUIREMENTS FOR MANUFACTURED HOME OWNERS WHO LEASE A SPACE

Family Income

In determining the annual income of families leasing manufactured home spaces, the value of the family's equity in the manufactured home in which the family resides is not counted as a family asset.

Lease and HAP Contract

There is a designated HAP Contract (form HUD-52642) and designated Tenancy Addendum (Form 52642-A) for this special housing type.

Rent to Owner

Rent to owner for a manufactured home space will include payment for maintenance services the owner must provide to the tenant under the lease for the space.

Rent to owner does not include the cost of utilities and trash collection for the manufactured home. However, the owner may charge the family a separate fee for the cost of utilities or trash collection provided by the owner.

15-VI.C. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

[FR Notice 1/18/17]

Payment Standards

The PHA payment standard for manufactured homes is determined in accordance with 24 CFR 982.505 and is the payment standard used for the PHA's HCV program. It is based on the applicable FMR for the area in which the manufactured home space is located.

The payment standard for the family is the lower of the family unit size (voucher size) or the payment standard for the number of bedrooms in the manufactured home.

During the term of a voucher tenancy, the amount of the monthly housing assistance payment for a manufactured homeowner who is renting the manufactured home space will equal the lesser of:

- The regular payment standard minus the total tenant payment; or
- The gross rent for rental of the real property on which the manufactured home owned by the family is located (the space rent), minus the total tenant payment.

Utility Allowance

The HACSD will establish utility allowances for manufactured home space rental. For the first 12 months of the initial lease term only, the allowances will include a reasonable amount for utility hook-up charges payable by the family, if the family actually incurs the expenses because of a move.

Allowances for utility hook-up charges do not apply to a family that leases a manufactured home space in place. Utility allowances for manufactured home space must not be applied to cover the costs of digging a well or installation of a septic system.

If the amount of the monthly assistance payment for a family exceeds the monthly rent for the manufactured home space (including the owner's monthly management and maintenance charges), the PHA may pay the remainder to the family, lender, or utility company.

HACSD Policy

The HACSD will use the same utility allowances from the PHA Utility Allowance Schedule for manufactured homes as for other housing types of the same size.

Space Rent

The rent for the manufactured home space (including other eligible housing expenses) is the total of:

- The rent charged for the manufactured home space;
- Owner maintenance and management charges for the space;
- The monthly payments made by the family to amortize the cost of purchasing the manufactured home, including any required insurance and property taxes; and
- The applicable allowance for tenant-paid unities.

Amortization Costs

The monthly payment made by the family to repay the cost of purchasing the manufactured home is the debt service established at the time of application to a lender for financing the purchase of the manufactured home if monthly payments are still being made. Any increase in debt service due to refinancing after purchase of the home may not be included in the repayment cost. Debt

service for set-up charges incurred by a family may be included in the monthly amortization payments made by the family. In addition, set-up charges incurred before the family became an assisted family may be included in the repayment cost if monthly payments are still being made to finance the charges.

Housing Assistance Payment

The HAP for a manufactured home space under the housing choice voucher program is the lower of the payment standard minus the TTP or the manufactured home space rent (including other eligible housing expenses) minus the TTP.

Rent Reasonableness

Initially, and at least annually thereafter, the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly housing assistance payment, the owner of the manufactured home space certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the same manufactured home park or elsewhere.

If requested by the PHA, the owner must give the PHA information on rents charged by the owner for other manufactured home spaces.

HACSD Policy

The HACSD will not approve a lease for a manufactured home space until the HACSD has determined that the initial rent to owner for the space is a reasonable rent. At least annually during the assisted tenancy, the HACSD will re-determine that the rent is reasonable.

The HACSD will determine whether the rent to the owner for a manufactured home space is a reasonable rent in comparison to rents for other comparable manufactured home spaces. The HACSD will consider the size and location of the space and any services and maintenance provided by the owner in accordance with the lease. The HACSD will evaluate reasonable rent annually whether the rent has increased or not.

15-VI.D. HOUSING QUALITY STANDARDS

Under either type of occupancy described in 15-VI.A above, the manufactured home must meet all HQS performance requirements and acceptability criteria discussed in Chapter 8 of this plan. In addition, the following requirement applies:

Manufactured Home Tie-Down

A manufactured home must be placed on the site in a stable manner, and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.

The HACSD has a HUD waiver for the tie-down requirement for manufactured homes.

PART VII: HOMEOWNERSHIP
[24 CFR 982.625 through 982.643]

15-VII.A. OVERVIEW [24 CFR 982.625]

The homeownership option is used to assist a family residing in a home purchased and owned by one or more members of the family. A family assisted under this option may be newly admitted or an existing participant in the HCV program. The PHA must have the capacity to operate a successful HCV homeownership program as defined by the regulations.

There are two forms of homeownership assistance described in the regulations: monthly homeownership assistance payments and single down payment assistance grants. However, PHAs may not offer down payment assistance until and unless funding is allocated by Congress. Since this has not yet happened, only monthly homeownership assistance may be offered.

The PHA may choose not to offer homeownership assistance. However, the PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities. It is the sole responsibility of the PHA to determine whether it is reasonable to implement a homeownership program as a reasonable accommodation. The PHA must determine what is reasonable based on the specific circumstances and individual needs of the person with a disability. The PHA may determine that it is not reasonable to offer homeownership assistance as a reasonable accommodation in cases where the PHA has otherwise opted not to implement a homeownership program. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

HACSD Policy

New applications for the Housing choice Voucher Homeownership Program are not being accepted.

The HACSD Housing Choice Voucher Homeownership Program was designed to expand homeownership opportunities for voucher participants. This program assists HCV participants as they transition from rental assistance to homeownership using their voucher assistance. The HACSD has adopted the homeownership option, although it may not be readily workable given the high cost of housing within the HACSD jurisdiction. The Homeownership Program will be administered as follows:

The HCV Homeownership Program is available to voucher holders who meet the minimum qualifications set forth in this plan and who can independently secure a mortgage loan. Co-signers are not allowed. The number of participants served through the HCV Homeownership program is currently limited to the parameters set forth in the HACSD Agency Plan.

- HACSD may limit homeownership to a maximum number of searching families at any time, reduce the program size, or suspend the program.
- HACSD may provide homeownership assistance in the form of monthly payments, or as a down payment assistance grant. The HACSD will offer the form of assistance it determines to be the most beneficial to the family.
- A family that includes a person who was an adult member of a family that previously received either form of homeownership assistance may not receive any other form of assistance from the HACSD.

15-VII.B. FAMILY ELIGIBILITY [24 CFR 982.627]

- If the PHA offers the homeownership option, participation by the family is optional. However, the family must meet all of the requirements listed below before the commencement of homeownership assistance. The family must be receiving rental assistance through the HACSD's Housing Choice Voucher program for the last 12 months.
- The family must qualify as a first-time homeowner or be a cooperative member.
- The family must provide seasoned asset verification of a minimum of 1% of the purchase price of the home in a savings account. The term "seasoned asset" is defined as having been in the savings account for a year or longer.
- The PHA has established a minimum income requirement based on the most recent County Median Income figures. To meet the gross Annual Earned Income requirement, the family must earn at least 50 percent of the current County Median Income for the family's size. The family may contact the HCV Homeownership Program Coordinator for the most recent County Median Income figures.
- In the case that the family meets the federal minimum income requirement, the adult family members who will own the home must have a gross non-welfare annual income equal to the federal minimum wage multiplied by 2000 hours. Unless the family is elderly or disabled, income from welfare assistance will not be counted toward this requirement.
- The family must meet the federal minimum employment requirement.
 - At least one adult family member who will be on the mortgage document to own the home must be currently employed full-time (no less than 30 hours per week) at state minimum wage or above, and must have continuous employment for a period of no less than 12 months prior to the application of the HCV Homeownership Program.
 - HUD regulations define "full time employment" as not less than an average of 30 hours per week at state minimum wage or above.
 - Part-time employment by both parties, totaling over 30 hours per week at state minimum wage or above, does not constitute full-time employment by either party.
 - The applicant head of household, spouse or adult on the mortgage document must remain continuously employed (no less than 30 hours per week) at state minimum wage or above while participating in the program.
- A family member will be considered to have been continuously employed even if that family member has experienced a break in employment, provided that the break in employment:
 - Did not occur within the last nine-month period immediately prior to the family's request

to utilize the homeownership option;

- Did not last more than four weeks; or,
- Has been the only break in employment within the past 12 calendar months.

HACSD has the discretion to interpret small gaps in employment. Permissible gaps can only occur if loss of employment resulted from measures beyond the employee's control (layoff, medical emergency); and did not result in an employment gap of more than four consecutive weeks.

Documentation of the initial employment requirement for the HCV Homeownership program will be completed using the Employment Verification Form. All verifications will be completed via EIV, third-party written or oral communication with the applicant's employer. Annual documentation of the full-time employment requirement will be completed at the annual reexamination.

Lenders may have separate requirements and may further require participants to demonstrate a history of full-time, continuous employment of no less than 24 months at 40 hours per week.

The federal minimum employment requirement does not apply to elderly or disabled families who must meet the minimum income requirement of the current monthly Supplemental Security Income benefit multiplied by 12.

Welfare assistance payments for adult family members who will own the home will be included in the determination of the minimum income requirement in the case of families with an elderly or disabled head, spouse or sole member.

Families meeting the HUD federal minimum income requirement must nevertheless be considered to meet the PHA income requirement if:

- The family meets the applicable HUD standards; and
- The family demonstrates that the family has been pre-approved or pre-qualified for financing in an amount sufficient to purchase decent, safe and sanitary housing of modest design in the PHA's jurisdiction.

The pre-approved or pre-qualified financing must further meet any PHA requirements for financing in general, including the qualifications of the lender and the terms of the loan.

- Any family member who has previously defaulted on a mortgage obtained through the homeownership option is barred from receiving future homeownership assistance.
- An applicant must be in good standing with their landlord and HACSD with regard to their family obligations and contracts.

The family must satisfy the prerequisite of being in "good standing" prior to receiving a Certificate of Eligibility for the homeownership program. For the purposes of the homeownership program, "good standing" is defined as meeting all of the conditions prior to and during the homeownership shopping period, as outlined below.

A landlord reference(s) indicating that during the prior year the family has an uninterrupted record of paying monthly rent in full and on time, and satisfactorily meets all other lease obligations as documented on the Homeownership Landlord Reference form. All verifications will be completed via third-party written or oral communication with the applicant's landlord.

The HACSD will impose the following additional initial requirements:

- The family has no family-caused violations of HUD's Housing Quality Standards within the last year.

- The family is not within the initial term of the lease.
- The family does not owe money to the HACSD.
- The family has not committed any serious or repeated violations of a HACSD-assisted lease within five years.
- The family has not had any arrests for violent or drug-related criminal activities over the last three years.

15-VII.C. SELECTION OF FAMILIES [24 CFR 982.626]

Unless otherwise provided (under the homeownership option), the PHA may limit homeownership assistance to families or purposes defined by the PHA and may prescribe additional requirements for commencement of homeownership assistance for a family. Any such limits or additional requirements must be described in the PHA administrative plan.

If the PHA limits the number of families that may participate in the homeownership option, the PHA must establish a system by which to select families to participate.

Preferences

When there are program vacancies, program participants will be recruited from the HACSD's Family Self-Sufficiency Program. Other preference groups will not be actively solicited but will be mailed an application to the program's waiting list upon request. Candidates who receive top ranking will be those who have the largest amount of non-committed seasoned savings to apply toward down payment and closing costs.

Program participation will be offered to eligible candidates in the following priority order, with date and time of application to the program's waiting list to be the deciding factor among priority groups:

- (1) **Family Self-Sufficiency (FSS)** program participants who have not yet received FSS escrow account full payout or who had received FSS escrow account payout within 30 days of the date they completed the Qualification Questionnaire.
- (2) **Section 8** program participants displaced from an assisted rental unit that is undergoing a condominium conversion, are pre-qualified for a loan to purchase their units, and who meet the Homeownership Program requirements are eligible for participation.
- (3) **Portability Homeownership** participants who were found eligible for the Section 8 Homeownership program at the initial agency and the initial agency certifies they are porting as Homeownership participants and not porting for rental assistance.
- (4) **A family with a person with disabilities** that has been pre-qualified for a loan and identified a property in the jurisdiction of the HACSD that the family has sufficient resources to purchase.
- (5) **Housing Choice Voucher** program participants who will graduate from a training or educational course within the next six months and expect their annual earnings to increase within the next year. Candidates who receive top ranking will be those who have the largest amount of money to apply toward down payment and closing costs, and then by those who have the highest annual income.
- (6) **Other Housing Choice Voucher** program participants who are pre-qualified for the purchase of a residence and have identified an eligible residence.
- (7) Other Housing Choice Voucher program participants.

15-VII.D. ELIGIBLE UNITS [24 CFR 982.628]

Eligible homes must be located within the respective geographic boundaries that govern the HACSD's HCV rental program.

A family approved for homeownership assistance may purchase the following type of homes:

- A new or existing home;
- A one-unit property or a single-family home;
- A condominium;
- A home in a planned-use development, a cooperative, a loft or live/work unit; or
- A manufactured home, if situated on a privately-owned lot or on a leased pad in a mobile home park.

If the family does not own fee title to the real property on which the home is located, the family must have the right to occupy the site for a period of at least forty (40) years and the home must have a permanent foundation.

A unit can be under construction at the time a family enters into the contract of sale. A unit is considered to be "under construction" if the footers have been poured. The PHA will not commence Housing Assistance Payments until the unit has satisfactorily passed an HQS and an independent inspection (performed by an independent inspector designated by the family), and meets all other program requirements.

The unit must meet HUD's "eligible housing" requirements. The unit may not be any of the following:

- A public housing or Indian housing unit;
- A unit receiving Section 8 project-based assistance;
- A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing services;
- A college or other school dormitory;
- On the grounds of penal, reformatory, medical, mental, or similar public or private institutions;
- A manufactured home in a park, with the exception noted above.

The HACSD must not approve the unit if the HACSD has been informed that the seller is debarred, suspended, or subject to a limited denial of participation. The HACSD may disapprove the seller for any reason provided for disapproval of an owner in the voucher program.

15-VII.E. ADDITIONAL PHA REQUIREMENTS FOR SEARCH AND PURCHASE [24 CFR 982.629]

It is the family's responsibility to find a home that meets the criteria for voucher homeownership assistance. The PHA may establish the maximum time that will be allowed for a family to locate and purchase a home and may require the family to report on their progress in finding and purchasing a home. If the family is unable to purchase a home within the maximum time established by the PHA, the PHA may issue the family a voucher to lease a unit or place the family's name on the waiting list for a voucher.

The HACSD has established the maximum time that will be allowed for a family to locate and purchase a home. The HACSD may, at its discretion, allow a reasonable extension of the maximum time, if requested in writing with justification.

The family's deadline date for locating a home to purchase will be 210 calendar days from the date the family's eligibility for the homeownership option is determined.

The family must obtain financing for the home within 120 calendar days of the date the home was located.

The family must purchase the home within 270 calendar days of the date the home was located.

The HACSD will not require periodic reports on the family's progress in finding and purchasing a home.

If the family is unable to purchase a home within 600 days from the date the family's eligibility was determined, the HACSD will place the family's name on the voucher waiting list at the bottom. The HACSD may extend the deadlines for locating and purchasing a home upon request.

15-VII.F. HOMEOWNERSHIP COUNSELING [24 CFR 982.630]

When the family has been determined eligible, it must attend and satisfactorily complete homeownership counseling sessions. HACSD staff or another counseling service will hold the counseling sessions. Such counseling shall be consistent with HUD-approved housing counseling.

- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the HACSD jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 et seq.) (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The PHA may adapt the subjects covered in pre-assistance counseling (as listed) to local circumstances and the needs of individual families.

The PHA may also offer additional counseling after commencement of homeownership assistance (ongoing counseling). If the PHA offers a program of ongoing counseling for participants in the homeownership option, the PHA shall have discretion to determine whether the family is required to participate in the ongoing counseling.

If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program.

15-VII.G. HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER [24 CFR 982.631]

Home Inspections

The HACSD may not commence monthly homeownership assistance payments for a family until the HACSD has inspected the unit and has determined that the unit passes HQS.

An independent professional inspector selected by and paid for by the family must also inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components.

The independent inspector must not be a HACSD employee or contractor. The HACSD will not require the family to use an independent inspector selected by the HACSD, but the inspector selected must hold credentials required by the lending industry.

Copies of the independent inspection report will be provided to the family and the HACSD. Based on the information in this report, the family and the HACSD will determine whether any pre-purchase repairs are necessary.

The HACSD may disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with HQS.

Contract of Sale

Before commencement of monthly homeownership assistance payments, a member or members of the family must enter into a contract of sale with the seller of the unit to be acquired by the family. The family must give the HACSD a copy of the contract of sale. The contract of sale must:

- Specify the price and other terms of sale by the seller to the purchaser;
- Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser;
- Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser;
- Provide that the purchaser is not obligated to pay for any necessary repairs; and
- Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24.

Disapproval of a Seller

In its administrative discretion, the PHA may deny approval of a seller for the same reasons a PHA may disapprove an owner under the regular HCV program [see 24 CFR 982.306(c)].

15-VII.H. FINANCING [24 CFR 982.632]

The PHA may establish requirements for financing purchase of a home under the homeownership option. This may include requirements concerning qualification of lenders, terms of financing, restrictions concerning debt secured by the home, lender qualifications, loan terms, and

affordability of the debt. The PHA must establish policies describing these requirements in the administrative plan.

A PHA may not require that families acquire financing from one or more specified lenders, thereby restricting the family's ability to secure favorable financing terms.

The family is responsible for securing financing. The HACSD has established financing requirements, listed below, and may disapprove proposed financing if the HACSD determines that the debt is unaffordable. Co-signers are not allowed.

The HACSD will, on the primary loan, prohibit the following forms of financing:

- Principal and interest payment increases (e.g., interest-only payment or at the beginning of the loan)
- Balloon payment mortgages
- Variable interest rate loans
- Adjustable interest rate loans

The above restrictions do not apply to secondary financing offered through first-time homebuyer closing costs and down payment assistance programs.

The HACSD requires a minimum cash down payment of one percent (1%) of the purchase price of the home to be paid from the family's own seasoned savings. The total down payment must be at least three percent (3%) of the purchase price. The 2% requirement is satisfied by receiving funds through first-time homebuyer down payment assistance programs, as long as repayment is forgiven or deferred.

Closing costs must be reasonable when compared to the standard industry practices of major reputable lenders backed by Fannie Mae or Freddie Mac.

A participating homeownership family may not refinance for an amount greater than the current loan balance, and the new loan is subject to the above restrictions.

15-VII.I. CONTINUED ASSISTANCE REQUIREMENTS; FAMILY OBLIGATIONS

[24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. If the family moves out of the home, the PHA may not continue homeownership assistance after the month when the family moves out. The family or lender is not required to refund to the PHA the homeownership assistance for the month when the family moves out.

Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.

A family must disclose all changes in income within fourteen (14) business days of the change and at the annual reexamination. Failure to disclose or accurately report changes will jeopardize a family's continued participation in this program. A family may not add an adult household member without prior HACSD approval. HACSD will deny admission to any individual who would otherwise not qualify for admission to the program due to criminal history, drug-related history, or registry on a sex-offender list.

The family must comply with the following obligations:

- The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing of such debt.

- The family may not convey or transfer ownership of the home, except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to 24 CFR 982.551 (h) and (i).
- The family must provide required information regarding income and family composition in order to correctly calculate the total tenant payment (TTP) and homeownership assistance, consistent with the HCV requirements as specified in CFR 982.551(b), and any other information requested by HACSD or HUD concerning financing or refinancing, the sale or transfer of any interest in the home, or the family's homeownership expenses.
- The family must notify the PHA before moving out of the home.
- The family must notify the PHA if the family defaults on the mortgage used to purchase the home.
- No family member may have any ownership interest in any other residential property.

Annual Activities

Payment Standard Changes

The payment standard will be increased when the applicable payment standard increases, but the payment standard will never be less than the payment standard at the time of home purchase.

Annual and Interim Examinations

Families are subject to annual and interim examinations in accordance with the policies elsewhere in this Plan. The limitations on household additions do not apply.

No annual inspection is required. The family agrees to maintain the condition of the home to comply with the minimum HUD Housing Quality Standards (HQS). HACSD reserves the right to conduct interim HQS inspections before continuing to provide yearly homeownership assistance. HACSD may exercise this option if it has reason to believe the home would no longer meet HQS standards or has reason to believe that unauthorized individuals are living in the household.

A PHA inspection is required if the PHA has granted as a reasonable accommodation an additional bedroom size for medical equipment or for a live-in aide. The inspection is to verify that the additional bedroom is being used for its intended purpose. If the extra bedroom is not being used for the intended purpose, the PHA must reduce the subsidy standard and corresponding payment standard at the family's next annual recertification. Special HQS inspections may be conducted if there is information indicating the unit is violating HQS.

Family Obligations

Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.

Continuous Employment Obligations

The applicant head of household or spouse must remain continuously employed (no less than 30 hours per week) at state minimum wage or above while participating in the program.

Part-time employment by both parties, totaling over 30 hours per week at state minimum wage or above, does not constitute full-time employment by either party.

For continued eligibility purposes, continuous employment is defined two ways:

- Continuous employment by the head, spouse or co-head defined as full-time employment

(average of 30 hours per week) at state minimum wage or above with no gap in employment lasting more than four weeks total (30 hours x 48 weeks = 1,440 hours), or

- Earned income received by the head, spouse or co-head during the past year greater than the state minimum wage times 1560 hours.

The employment requirement is not applicable to elderly families or those whose head or co-head of household, spouse or sole member experience permanent disability.

Mitigating Circumstances

If a working family is subsequently determined by HACSD to now qualify as a “disabled family,” as defined by HUD, the full-time employment requirement is no longer applicable to that family.

HACSD will consider mitigating circumstances where certain lapses in employment prohibit the family from meeting its continuous employment obligation. These include receipt of Unemployment Insurance Benefits due to layoff; absences defined under the Family Medical Leave Act; receipt of Worker’s Compensation benefits.

HACSD will allow week-for-week substitutions whenever of any of these benefits are received.

The participant must return to full-time employment within 30 days after exhaustion of unemployment benefits. Failure to return to full-time employment (30 hours per week) at state minimum wage or above within 30 days will generate a 60-day Notice to Correct. Failure to correct will result in a correctable 30-day Notice of Termination.

A participant who is employed but is on leave from work due to maternity leave, FMLA or is receiving Worker’s Compensation, is exempt from the full-time employment requirement during the period of approved leave from work. A participant must return to full-time employment within 30 days after exhaustion of applicable benefits. Willful failure to return to full-time employment (30 hours per week) at state minimum wage or above, after 30 days, will generate a 60-day Notice to Correct. Failure to correct will result in a correctable 30-day Notice of Termination.

Consideration of other mitigating circumstances is at the discretion of the Program Coordinator recommendation to the HCV Program Administrator. The Program Administrator will convene a three-person committee to review any additional mitigating circumstances that prevent a participant’s return to full-time employment within the time frames allotted. Determinations of the review committee are made on a case-by-case basis. Their decisions may be subject to final approval by the HACSD Deputy Director.

Guests and Changes in Family Composition

All changes in family composition must be reported to the Housing Program Specialist. All new family members must be approved as eligible residents before moving into the residence.

Family guests are permitted for a period not to exceed 30 days in any calendar year. HACSD may consider persons who exceed the 30-day occupancy limit, or who use the residence as a personal mailing address, unauthorized family members. The family may be in violation of their family obligations and HACSD may take appropriate action up to and including termination of assistance.

15-VII.J. MAXIMUM TERM OF HOMEOWNER ASSISTANCE [24 CFR 982.634]

Except in the case of a family that qualifies as an elderly or disabled family, other family members (described below) shall not receive homeownership assistance for more than:

- Fifteen years, if the initial mortgage incurred to finance purchase of the home has a term of

Chapter 16 - PROGRAM ADMINISTRATION

INTRODUCTION

This chapter discusses administrative policies and practices that are relevant to the activities covered in this plan. The policies are discussed in seven parts as described below:

Part I: Administrative Fee Reserve. This part describes the PHA's policies with regard to oversight of expenditures from its administrative fee reserve.

Part II: Setting Program Standards and Schedules. This part describes what payment standards are, and how they are updated, as well as how utility allowances are established and revised.

Part III: Informal Reviews and Hearings. This part outlines the requirements and procedures for informal reviews and hearings, and for informal hearings regarding citizenship status.

Part IV: Owner or Family Debts to the PHA. This part describes policies for recovery of monies that the PHA has overpaid on behalf of families, or to owners, and describes the circumstances under which the PHA will offer repayment agreements to owners and families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.

Part V: Section 8 Management Assessment Program (SEMAP). This part describes what the SEMAP scores represent, how they are established, and how those scores affect a PHA.

Part VI: Record-Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies the PHA will follow.

Part VII: Reporting and Record Keeping for Children with Elevated Blood Lead Level. This part describes the PHA's responsibilities for reporting, data collection, and record keeping relative to children with elevated blood lead levels that are less than six years of age and are receiving HCV assistance.

Part VIII: Determination of Insufficient Funding. This part describes the PHA's policies for determining if there is sufficient funding to issue vouchers, to approve moves to higher cost units or areas, and to continue assistance for all participant families.

Part IX: Violence against Women Act (VAWA): Notification, Documentation, Confidentiality. This part contains key terms used in VAWA and describes requirements related to notifying families and owners about their rights and responsibilities under VAWA; requesting documentation from victims of domestic violence, dating violence, sexual assault, and stalking; and maintaining the confidentiality of information obtained from victims.

PART I: ADMINISTRATIVE FEE RESERVE
[24 CFR 982.155]

The PHA must maintain administrative fee reserves, or unrestricted net position (UNP) for the program to pay program administrative expenses in excess of administrative fees paid by HUD for a PHA fiscal year.

HUD appropriations acts beginning with FFY 2004 have specified that administrative fee funding may be used only for activities related to the provision of HCV assistance, including related development activities.

Notice PIH 2012-9 cites two examples of related development activities: unit modification for accessibility purposes and development of project-based voucher units. Other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for “other housing purposes permitted by state and local law,” in accordance with 24 CFR 982.155(b)(1).

In addition, as specified in Notice PIH 2022-18, PHAs may use administrative fee funding for both administrative and “other expenses” needed to employ strategies and undertake activities beyond regular administrative responsibilities to facilitate the successful leasing and use of housing choice vouchers by families, such as through the use of security deposit assistance and landlord recruitment and incentive payments, among other allowable expenses specified in the notice. PHAs are also permitted to use UNP for these expenses [Notice PIH 2022-18].

If the PHA has not adequately administered any Section 8 program, HUD may prohibit use of funds in the administrative fee reserve and may direct the PHA to use funds in the reserve to improve administration of the program or to reimburse ineligible expenses. HUD may also prohibit the use of funds for certain purposes.

HUD requires the PHA Board of Commissioners or other authorized officials to establish the maximum amount that may be charged against the UNP account without specific approval.

HACSD Policy

Expenditures from the UNP account will be made in accordance with all applicable federal requirements. Expenditures will not exceed \$100,000 per occurrence without the prior approval of the PHA’s Board of Commissioners

PART II: SETTING PROGRAM STANDARDS AND SCHEDULES

16-II.A. OVERVIEW

Although many of the program's requirements are established centrally by HUD, the HCV program's regulations recognize that some flexibility is required to allow the PHA to adapt the program to local conditions. This part discusses how the PHA establishes and updates certain schedules and standards that are used to administer the program locally. Details about how these schedules are applied to individual families are provided in other chapters. The schedules and standards discussed here include:

- *Payment Standards*, which dictate the maximum subsidy a family can receive (application of the payment standards is discussed in Chapter 6); and
- *Utility Allowances*, which specify how a family's payment should be adjusted to account for tenant-paid utilities (application of utility allowances is discussed in Chapter 6).

HACSD Policy

The payment standard and utility allowance schedules are available for review on the HACSD website, by mail and at the HACSD's office during normal business hours.

The HACSD will maintain documentation to support its annual review of payment standards and utility allowance schedules. This documentation will be retained for at least 3 years.

Establishing and updating the PHA passbook rate, which is used to calculate imputed income from assets, is covered in Chapter 6 (see Section 6-I.G.).

16-II.B. PAYMENT STANDARDS [24 CFR 982.503; HCV GB]

The payment standard sets the maximum subsidy payment a family can receive from the PHA each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of rents in the market area.

The PHA must establish a payment standard schedule that establishes payment standard amounts for each FMR area within the PHA's jurisdiction, and for each unit size within each of the FMR areas. For each unit size, the PHA may establish a single payment standard amount for the whole FMR area, or may set different payment standards for different parts of the FMR area. Unless HUD grants an exception, the PHA is required to establish a payment standard within a "basic range" established by HUD – between 90 and 110 percent of the published FMR for each unit size.

HACSD Policy

On November 16, 2016, HUD published the Small Area Fair Market Rents (SAFMR) Final Rule. The rule provides that in lieu of determining Housing Choice Voucher (HCV) payment standards using a metropolitan area-wide Fair Market Rent (FMR), payment standards will use FMRs calculated for ZIP codes within metropolitan areas. SAFMRs are required to be used in areas designated by HUD. The San Diego metropolitan area was designated to use SAFMRs in determining payment standards. HACSD implemented the use of SAFMRs effective October 1, 2018.

HACSD Policy

Payment standards may be adjusted, depending on available funding, within HUD regulatory and financial limitations, to increase housing assistance payments to keep family rents affordable. The HACSD will not raise payment standards solely to make "high end" units available to voucher holders. The HACSD may use some or all of the measures below in making its determination of whether an adjustment should be made to the payment standards.

Assisted Families' Rent Burdens

If it is determined that there is a decline in the number of families successfully leasing into an eligible unit prior to the expiration of their vouchers, the HACSD may review its voucher payment standard amounts to determine whether more than 40 percent of families in a particular unit size are paying more than 30 percent of their annual adjusted income for rent.

If it is determined that the rents of particular unit sizes in the HACSD's jurisdiction are creating rent burdens for families, the HACSD may modify its payment standards for those particular unit sizes.

The HACSD may establish a separate voucher payment standard, within the basic range, for designated parts of its jurisdiction, if it determines that a higher payment standard is needed in these designated areas to provide families with quality housing choices and to give families an opportunity to move outside areas of high poverty or into neighborhoods with greater opportunity.

Quality of Units Selected

The HACSD may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing to ensure that payment standard increases are needed to reach the mid-range of the market.

Families Rent Burden Analysis

The HACSD may review the average percent of income that families on the program are paying for rent. If more than 40 percent of families are paying more than 30 percent of monthly-adjusted income for a particular unit size, the HACSD may evaluate the number of families renting units larger than their voucher size, or luxury or high-end units.

If families are paying more than 30 percent of their income for rent due to the selection of larger bedroom size units or luxury units, the HACSD will decline to increase the payment standard. If this is not the primary reason for families' rent burden, the HACSD will continue increasing the payment standard within HUD regulatory limitations.

Rent to Owner Increases

The HACSD may review a sample of the units to determine how often owners are increasing rents and the average percent of increase by bedroom size.

Time to Locate Housing

The HACSD may consider the average time period for families to lease up under the voucher program. If voucher holders are unable to locate suitable housing within their voucher term due to unaffordable rents and funding permits, the payment standard may be adjusted.

Lowering of the Payment Standard

Lowering of the SAFMRs may require an adjustment of the payment standard. Additionally, statistical analysis may reveal that the payment standard should be lowered. In any case, the payment standard will not be set below 90 percent of the SAFMR without authorization from HUD.

Financial Feasibility

Before increasing the payment standard, the HACSD may review its budget to determine the impact of projected subsidy increases on funding available for the program and the number of families served.

For this purpose, the HACSD will compare the number of families served under higher payment standards to the number assisted under current payment standards.

Exception Payment Standards [24 CFR 982.503(c), Notice PIH 2018-01, FR Notice 9/27/21]

For designated SAFMR PHAs and Opt-in SAFMR PHAs HUD will issue a separate Federal Register notice proposing conditions and procedures under which a PHA using SAFMRs may request HUD approval to establish an exception payment standard that exceeds 110 percent of the SAFMR. The requirements at 24 CFR §982.503(c) do not apply to such requests.

HUD allows PHAs to establish a HUD-Veterans Affairs Supportive Housing (HUD-VASH) exception payment standard. (See Section 19-IV.F.).

Unit-by-Unit Exceptions [24 CFR 982.503(b), 24 CFR 982.505(d), Notice PIH 2010-26]

Unit-by-unit exceptions to the PHA's payment standards generally are not permitted. However, an exception may be made as a reasonable accommodation for a family that includes a person with disabilities. (See Chapter 2 for a discussion of reasonable accommodations.) This type of exception does not affect the PHA's payment standard schedule.

When needed as a reasonable accommodation, the PHA may make an exception to the payment standard without HUD approval if the exception amount does not exceed 120 percent of the applicable FMR for the unit size [24 CFR 982.503(b)]. The PHA may request HUD approval for an exception to the payment standard for a particular family if the required amount exceeds 120 percent of the FMR.

HACSD Policy

The HACSD, if funding is available, may approve a higher payment standard up to 120 percent of SAFMR as a reasonable accommodation for a family that includes a person with disabilities. The HACSD's policies and practices are designed to provide reasonable accommodations to persons with disabilities, upon request, so they may fully access and utilize the housing program and related services.

Decreases in the Payment Standard below the Basic Range [24 CFR 982.503(d)]

The PHA must request HUD approval to establish a payment standard amount that is lower than the basic range. At HUD's sole discretion, HUD may approve establishment of a payment standard lower than the basic range. HUD will not approve a lower payment standard if the family share for more than 40 percent of program participants exceeds 30 percent of adjusted monthly income.

PART V: SECTION 8 MANAGEMENT ASSESSMENT PROGRAM (SEMAP)

16-V.A. OVERVIEW

The Section 8 Management Assessment Program (SEMAP) is a tool that allows HUD to measure PHA performance in key areas to ensure program integrity and accountability. SEMAP scores translate into a rating for each PHA as high performing, standard, or troubled. Scores on individual SEMAP indicators, as well as overall SEMAP ratings, can affect the PHA in several ways.

- High-performing PHAs can be given a competitive advantage under notices of funding availability [24 CFR 985.103].
- PHAs with deficiencies on one or more indicators are required to correct the deficiencies and report to HUD [24 CFR 985.106].
- PHAs with an overall rating of “troubled” are subject to additional HUD oversight, including on-site reviews by HUD staff, a requirement to develop a corrective action plan, and monitoring to ensure the successful implementation of the corrective action plan. In addition, PHAs that are designated “troubled” may not use any part of the administrative fee reserve for other housing purposes [24 CFR 985.107].
- HUD may determine that a PHA's failure to correct identified SEMAP deficiencies or to prepare and implement a corrective action plan required by HUD constitutes a default under the ACC [24 CFR 985.109].

16-V.B. SEMAP CERTIFICATION [24 CFR 985.101]

PHAs must submit the HUD-required SEMAP certification form within 60 calendar days after the end of its fiscal year. The certification must be approved by PHA board resolution and signed by the PHA executive director. If the PHA is a unit of local government or a state, a resolution approving the certification is not required, and the certification must be executed by the Section 8 program director.

Upon receipt of the PHA's SEMAP certification, HUD will rate the PHA's performance under each SEMAP indicator in accordance with program requirements.

HUD Verification Method

Several of the SEMAP indicators are scored based on a review of a quality control sample selected for this purpose. The PHA or the Independent Auditor must select an unbiased sample that provides an adequate representation of the types of information to be assessed, in accordance with SEMAP requirements [24 CFR 985.2].

If the HUD verification method for the indicator relies on data in the Form-50058 module (formerly known as MTCS) in the PIH Information Center (PIC), and HUD determines that those data are insufficient to verify the PHA's certification on the indicator due to the PHA's failure to adequately report family data, HUD will assign a zero rating for the indicator [24 CFR 985.3].

16-V.C. SEMAP INDICATORS

[24 CFR 985.3 and form HUD-52648]

SEMAP Indicators
Indicator 1: Selection from the waiting list
Indicator 2: Rent reasonableness
Indicator 3: Determination of adjusted income
Indicator 4: Utility allowance schedule
Indicator 5: HQS quality control inspections
Indicator 6: HQS enforcement
Indicator 7: Expanding housing opportunities <ul style="list-style-type: none"> Only applies to PHAs with jurisdiction in metropolitan FMR areas.
Indicator 8: FMR limit and payment standards
Indicator 9: Annual reexaminations
Indicator 10: Correct tenant rent calculations
Indicator 11: Pre-contract HQS inspections
Indicator 12: Annual HQS inspections
Indicator 13: Lease-up
Indicator 14: Family self-sufficiency (FSS) enrollment and escrow account balances <ul style="list-style-type: none"> Only applies to PHAs with mandatory FSS programs.
Success Rate of Voucher Holders <ul style="list-style-type: none"> Only applies to PHAs that have received approval to establish success rate payment standard amounts, and isn't effective until the second full PHA fiscal year following the date of HUD approval of success rate payment standard amounts.
Deconcentration Bonus Indicator

PART VI: RECORD KEEPING

16-VI.A. OVERVIEW

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

Records Monitoring

In addition to the required SEMAP documentation, the following functions will be monitored by supervisory staff:

- New applications and annual recertifications will be monitored for compliance with the regulations.
- All annual recertifications will be monitored for completion at least 30 days before the re-exam due date.
- All annual inspections will be monitored for completion at least 30 days before the due date or, if an annual inspection was not conducted due to biennial schedule, the file will be monitored to ensure that appropriate notification was given.

16-VI.B. RECORD RETENTION [24 CFR 982.158; 24 CFR 908.101]

During the term of each assisted lease, and for at least three years thereafter, the PHA must keep:

- A copy of the executed lease.
- The HAP contract; and
- The application from the family.

The PHA must keep the following records for at least three years:

- Records that provide income, racial, ethnic, gender and disability status data on program applicants and participants
- An application from each ineligible family and notice that the applicant is not eligible
- HUD required reports
- Unit inspection reports
- Lead-based paint records as required by 24 CFR 35, Subpart B
- Accounts and other records supporting PHA budget and financial statements for the program
- Records to document the basis for the PHA determination that rent to owner is reasonable rent (initially and during the term of the HAP contract)
- Other records specified by HUD

The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].

The PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].

Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.

The PHA must keep confidential records of all emergency transfers requested by victims of domestic violence, dating violence, sexual assault, and stalking under the PHA's Emergency Transfer Plan, as well as the outcomes of such requests, and retain the records for a period of three years [24 CFR 5.2005(e)(12)].

If an informal hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirement, see Section 16-III.D., Retention of Documents.

16-VI.C. RECORDS MANAGEMENT

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicants and participant files are maintained in a way that protects an individual's privacy rights.

HACSD Policy

All HACSD applicant and participant files and information will be kept in secure locations with access restricted to authorized personnel.

Privacy Act Requirements [24 CFR 5.212 and Form-9886]

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or HACSD may release the information collected.

Upfront Income Verification (UIV) Records

The PHA must adopt and follow specific security procedures to ensure that all EIV data is protected in accordance with federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in the HUD-issued document, *Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification data*.

HACSD Policy

HACSD staff will not discuss or disclose family information contained in files, upfront income verification (UIV) information, or third-party verifications, except for a lawful business reason. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action. Security access for the Enterprise Income Verification (EIV) systems will be reviewed quarterly and all users will have a signed user agreement on file. The HACSD will not disclose information obtained through the EIV system to any person other than the person to whom the income information pertains, even if another person has a release of information. In addition, the HACSD will not take any adverse action against the family as a result of information obtained from the EIV system but may take action if the information is confirmed by the family member or a third party.

Unauthorized persons may not remove files from secure storage areas including electronic storage systems.

The collection, maintenance, use and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of federal, state, and local law.

Criminal Records

The PHA must establish and implement a system of records management that ensures that any sex offender registration information received by the PHA from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation. However, a record of the screening, including the type of screening and the date performed must be retained [Notice PIH 2012-28]. This requirement does not apply to information that is public information or is obtained by a PHA other than under 24 CFR 5.905.

Medical/Disability Records

PHAs are not permitted to inquire about the nature or extent of a person's disability or about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA should not place this information in the tenant file; the PHA should destroy the document.

Documentation of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

For requirements and PHA policies related to management of documentation obtained from victims of domestic violence, dating violence, sexual assault, or stalking, see section 16-IX.E.

PART III: DWELLING UNITS

17-III.A. OVERVIEW

This part identifies the special housing quality standards that apply to the PBV program, housing accessibility for persons with disabilities, and special procedures for conducting housing quality standards inspections.

17-III.B. HOUSING QUALITY STANDARDS [24 CFR 983.101]

The housing quality standards (HQS) for the tenant-based program, including those for special housing types, generally apply to the PBV program. HQS requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.

The physical condition standards at 24 CFR 5.703 do not apply to the PBV program.

Lead-based Paint [24 CFR 983.101(c)]

The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, The Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR Part 35, Subparts A, B, H, and R, and 40 CFR 745.227, apply to the PBV program.

17-III.C. HOUSING ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The PHA must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102).

17-III.D. INSPECTING UNITS

Pre-selection Inspection [24 CFR 983.103(a)]

The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with HQS.

Pre-HAP Contract Inspections [24 CFR 983.103(b), FR Notice 1/18/17, and Notice PIH 2017-20]

The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions, or if the unit passed an alternative inspection.

HACSD Policy

HACSD will not provide assistance on behalf of the family until the unit fully complies with HQS.

Turnover Inspections [24 CFR 983.103(c)]

Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS.

Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14]

At least once every 24 months during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement. The PHA also has the option in certain mixed finance properties to rely on alternative inspections conducted at least triennially.

HACSD Policy

HACSD will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.

If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the PHA must reinspect 100 percent of the contract units in the building.

Other Inspections [24 CFR 983.103(e)]

The PHA must inspect contract units whenever needed to determine that the contract units comply with HQS and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The PHA must take into account complaints and any other information coming to its attention in scheduling inspections.

The PHA must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected an HQS violation, and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family violation of HQS.

In conducting PHA supervisory quality control HQS inspections, the PHA should include a representative sample of both tenant-based and project-based units.

Inspecting PHA-Owned Units [24 CFR 983.103(f)]

In the case of PHA-owned units, the inspections must be performed by an independent entity designated by the PHA and approved by HUD. The independent entity must furnish a copy of each inspection report to the PHA and to the HUD field office where the project is located. The PHA must take all necessary actions in response to inspection reports from the independent entity, including exercise of contractual remedies for violation of the HAP contract by the PHA-owner.

PART IV: REHABILITATED AND NEWLY CONSTRUCTED UNITS

17-IV.A. OVERVIEW [24 CFR 983.151]

There are specific requirements that apply to PBV assistance for newly constructed or rehabilitated housing that do not apply to PBV assistance in existing housing. This part describes the requirements unique to this type of assistance.

Housing selected for this type of assistance may not at a later date be selected for PBV assistance as existing housing.

17-IV.B. AGREEMENT TO ENTER INTO HAP CONTRACT

In order to offer PBV assistance in rehabilitated or newly constructed units, the PHA must enter into an agreement to enter into HAP contract (Agreement) with the owner of the property. The Agreement must be in the form required by HUD [24 CFR 983.152(b)]. The PHA may not enter into an Agreement if commencement of construction or rehabilitation has commenced after proposal submission [24 CFR 983.152(c)]. Construction begins when excavation or site preparation (including clearing of the land) begins for the housing. Rehabilitation begins with the physical commencement of rehabilitation activity on the housing.

In the Agreement the owner agrees to develop the PBV contract units to comply with HQS, and the PHA agrees that upon timely completion of such development in accordance with the terms of the Agreement, the PHA will enter into a HAP contract with the owner for the contract units [24 CFR 983.152(a)].

Content of the Agreement [24 CFR 983.152(d)]

At a minimum, the Agreement must describe the following features of the housing to be developed and assisted under the PBV program:

- Site and the location of the contract units;
- Number of contract units by area (size) and number of bedrooms and bathrooms;
- Services, maintenance, or equipment to be supplied by the owner without charges in addition to the rent;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner and utility services to be paid by the tenant;
- An indication of whether or not the design and construction requirements of the Fair Housing Act and section 504 of the Rehabilitation Act of 1973 apply to units under the Agreement. If applicable, any required work item resulting from these requirements must be included in the description of work to be performed under the Agreement;
- Estimated initial rents to owner for the contract units;
- Description of the work to be performed under the Agreement. For rehabilitated units, the description must include the rehabilitation work write up and, where determined necessary by the PHA, specifications and plans. For new construction units, the description must include the working drawings and specifications.
- Any additional requirements for quality, architecture, or design over and above HQS.

Execution of the Agreement [24 CFR 983.153]

The Agreement must be executed promptly after PHA notice of proposal selection to the selected owner. The PHA may not enter into the Agreement if construction or rehabilitation has started after proposal submission. Generally, the PHA may not enter into the Agreement with the owner until the subsidy layering review is completed. Likewise, the PHA may not enter into the Agreement until the environmental review is completed and the PHA has received environmental approval. However, the PHA does not need to conduct a subsidy layering review in the case of a HAP contract for existing housing or if the applicable state or local agency has conducted such a review. Similarly, environmental reviews are not required for existing structures unless otherwise required by law or regulation.

17-IV.C. CONDUCT OF DEVELOPMENT WORK

Labor Standards [24 CFR 983.154(b)]

If an Agreement covers the development of nine or more contract units (whether or not completed in stages), the owner and the owner's contractors and subcontractors must pay Davis- Bacon wages to laborers and mechanics employed in the development of housing. The HUD- prescribed form of the Agreement will include the labor standards clauses required by HUD, such as those involving Davis-Bacon wage rates.

The owner, contractors, and subcontractors must also comply with the Contract Work Hours and Safety Standards Act, Department of Labor regulations in 29 CFR part 5, and other applicable federal labor relations laws and regulations. The PHA must monitor compliance with labor standards.

Equal Opportunity [24 CFR 983.154(c)]

The owner must comply with federal equal employment opportunity requirements of Executive Orders 11246 as amended ([3 CFR, 1964](#)-1965 Comp., p. 339), 11625 ([3 CFR, 1971](#)-1975 Comp., p. 616), 12432 (3 CFR, 1983 Comp., p. 198) and 12138 (3 CFR, 1977 Comp., p. 393).

Owner Disclosure [24 CFR 983.154(d) and (e)]

The Agreement and HAP contract must include a certification by the owner that the owner and other project principals are not on the U.S. General Services Administration list of parties excluded from federal procurement and non-procurement programs.

The owner must also disclose any possible conflict of interest that would be a violation of the Agreement, the HAP contract, or HUD regulations.

17-IV.D. COMPLETION OF HOUSING

The Agreement must specify the deadlines for completion of the housing, and the owner must develop and complete the housing in accordance with these deadlines. The Agreement must also specify the deadline for submission by the owner of the required evidence of completion.

Evidence of Completion [24 CFR 983.155(b)]

At a minimum, the owner must submit the following evidence of completion to the PHA in the form and manner required by the PHA:

- Owner certification that the work has been completed in accordance with HQS and all requirements of the Agreement; and

- Owner certification that the owner has complied with labor standards and equal opportunity requirements in development of the housing.

At the PHA's discretion, the Agreement may specify additional documentation that must be submitted by the owner as evidence of housing completion.

HACSD Policy

The HACSD will determine the need for the owner to submit additional documentation as evidence of housing completion on a case-by-case basis depending on the nature of the PBV project. The HACSD will specify any additional documentation requirements in the Agreement to enter into HAP contract.

PHA Acceptance of Completed Units [24 CFR 983.156]

Upon notice from the owner that the housing is completed, the PHA must inspect to determine if the housing has been completed in accordance with the Agreement, including compliance with HQS and any additional requirements imposed under the Agreement. The PHA must also determine if the owner has submitted all required evidence of completion.

If the work has not been completed in accordance with the Agreement, the PHA must not enter into the HAP contract.

If the PHA determines the work has been completed in accordance with the Agreement and that the owner has submitted all required evidence of completion, the PHA must submit the HAP contract for execution by the owner and must then execute the HAP contract.

PART V: HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)

17-V.A. OVERVIEW

The PHA must enter into a HAP contract with an owner for units that are receiving PBV assistance. The purpose of the HAP contract is to provide housing assistance payments for eligible families. Housing assistance is paid for contract units leased and occupied by eligible families during the HAP contract term. With the exception of single-family scattered-site projects, a HAP contract shall cover a single project. If multiple projects exist, each project is covered by a separate HAP contract. The HAP contract must be in the form required by HUD [24 CFR 983.202(a)].

17-V.B. HAP CONTRACT REQUIREMENTS

Contract Information [24 CFR 983.203]

The HAP contract must specify the following information:

- The total number of contract units by number of bedrooms;
- The project's name, street address, city or country, state and zip code, block and lot number (if known), and any other information necessary to clearly identify the site and the building;
- The number of contract units in each building, the location of each contract unit, the area of each contract unit, and the number of bedrooms and bathrooms in each contract unit;
- Services, maintenance, and equipment to be supplied by the owner and included in the rent to owner;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner (included in rent) and utility services to be paid by the tenant;
- Features provided to comply with program accessibility requirements of Section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8;
- The HAP contract term;
- The number of units in any project that will exceed the 25 percent per project cap, which will be set aside for occupancy by qualifying families (elderly and/or disabled families and families receiving supportive services); and
- The initial rent to owner for the first 12 months of the HAP contract term.

Execution of the HAP Contract [24 CFR 983.204]

The PHA may not enter into a HAP contract until each contract unit has been inspected and the PHA has determined that the unit complies with the Housing Quality Standards (HQS), unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial HQS inspection as a result of only non-life-threatening conditions. For existing housing, the HAP contract must be executed promptly after the PHA selects the owner proposal and inspects the housing units. For newly constructed or rehabilitated housing the HAP contract must be executed after the PHA has inspected the completed units and has determined that the units have been completed in accordance with the agreement to enter into HAP, and the owner furnishes all required evidence of completion.

Term of HAP Contract [24 CFR 983.205, FR Notice 1/18/17, and Notice PIH 2017-21]

The PHA may enter into a HAP contract with an owner for an initial term of no less than one year and no more than 20 years for each contract unit. In the case of PHA-owned units, the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

At the time of the initial HAP contract term or any time before expiration of the HAP contract, the PHA may extend the term of the contract for an additional term of up to 20 years if the PHA determines an extension is appropriate to continue providing affordable housing for low-income families. A HAP contract extension may not exceed 20 years. A PHA may provide for multiple extensions; however, in no circumstances may such extensions exceed 20 years, cumulatively. Extensions after the initial extension are allowed at the end of any extension term, provided that not more than 24 months prior to the expiration of the previous extension contract the PHA agrees to extend the term, and that such extension is appropriate to continue providing affordable housing for low-income families or to expand housing opportunities. Extensions after the initial extension term shall not begin prior to the expiration date of the previous extension term.

Subsequent extensions are subject to the same limitations. All extensions must be on the contract and subject to the conditions prescribed by HUD at the time of the extension. In the case of PHA-owned units, any extension of the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

Termination by PHA [24 CFR 983.205(c) and FR Notice 1/18/17]

The HAP contract must provide that the term of the PHA's contractual commitment is subject to the availability of sufficient appropriated funding as determined by HUD or by the PHA in accordance with HUD instructions. For these purposes, sufficient funding means the availability of appropriations, and of funding under the ACC from such appropriations, to make full payment of housing assistance payments payable to the owner for any contract year in accordance with the terms of the HAP contract.

In times of insufficient funding, HUD requires that PHAs first take all cost-saving measures prior to failing to make payments under existing PBV HAP contracts.

If it is determined that there may not be sufficient funding to continue housing assistance payments for all contract units and for the full term of the HAP contract, the PHA may terminate the HAP contract by notice to the owner. The termination must be implemented in accordance with HUD instructions.

Termination by Owner [24 CFR 983.205(d)]

If in accordance with program requirements the amount of rent to an owner for any contract unit is reduced below the amount of the rent to owner at the beginning of the HAP contract term, the owner may terminate the HAP contract by giving notice to the PHA. In this case, families living in the contract units must be offered tenant-based assistance.

Statutory Notice Requirements: Contract Termination or Expiration [24 CFR 983.206, FR Notice 1/18/17, and Notice PIH 2017-21]

Not less than one year before the HAP contract terminates, or if the owner refuses to renew the HAP contract, the owner must notify the PHA and assisted tenants of the termination. The notice must be provided in the form prescribed by HUD. If the owner does not give timely notice, the owner must permit the tenants in assisted units to remain in their units for the required notice period with no increase in the tenant portion of their rent, and with no eviction as a result of the owner's inability to collect an increased tenant portion of rent. An owner may renew the

terminating contract for a period of time sufficient to give tenants one-year advance notice under such terms as HUD may require.

Upon termination or expiration of the contract, a family living at the property is entitled to receive a tenant-based voucher. Tenant-based assistance would not begin until the owner's required notice period ends. The PHA must provide the family with a voucher and the family must also be given the option by the PHA and owner to remain in their unit with HCV tenant-based assistance as long as the unit complies with inspection and rent reasonableness requirements. The family must pay their total tenant payment (TTP) and any additional amount if the gross rent exceeds the applicable payment standard. The family has the right to remain in the project as long as the units are used for rental housing and are otherwise eligible for HCV assistance. The owner may not terminate the tenancy of a family that exercises its right to remain except for serious or repeated lease violations or other good cause. Families that receive a tenant-based voucher at the expiration or termination of the PBV HAP contract are not new admissions to the PHA HCV tenant-based program and are not subject to income eligibility requirements or any other admission requirements. If the family chooses to remain in their unit with tenant-based assistance, the family may do so regardless of whether the family share would initially exceed 40 percent of the family's adjusted monthly income.

Remedies for HQS Violations [24 CFR 983.208(b)]

The PHA may not make any HAP payment to the owner for a contract unit during any period in which the unit does not comply with HQS. If the PHA determines that a contract does not comply with HQS, the PHA may exercise any of its remedies under the HAP contract, for any or all of the contract units. Available remedies include termination of housing assistance payments, abatement or reduction of housing assistance payments, reduction of contract units, and termination of the HAP contract.

HACSD Policy

The HACSD will abate and terminate PBV HAP contracts for non-compliance with HQS in accordance with the policies used in the tenant-based voucher program. These policies are contained in Section 8-II.G., Enforcing Owner Compliance.

17-V.C. AMENDMENTS TO THE HAP CONTRACT

Substitution of Contract Units [24 CFR 983.207(a)]

At the PHA's discretion and subject to all PBV requirements, the HAP contract may be amended to substitute a different unit with the same number of bedrooms in the same project for a previously covered contract unit. Before any such substitution can take place, the PHA must inspect the proposed unit and determine the reasonable rent for the unit.

Addition of Contract Units [FR Notice 1/18/17 and Notice PIH 2017-21]

The PHA and owner may amend the HAP contract to add additional PBV contract units in projects that already have a HAP contract without having to fulfill the selection requirements found at 24 CFR 983.51(b) for those additional PBV units, regardless of when the HAP contract was signed. The additional PBV units, however, are still subject to the PBV program cap and individual project caps. Prior to attaching additional units without competition, the PHA must submit to the local field office information outlined in FR Notice 1/18/17. The PHA must also detail in the administrative plan their intent to add PBV units and the rationale for adding units to the specific PBV project.

HACSD Policy

The HACSD may add units to the contract on a case-by-case basis to ensure the availability of affordable housing as long as the addition of units does not exceed allowable project caps.

17-V.D. HAP CONTRACT YEAR, ANNIVERSARY AND EXPIRATION DATES

[24 CFR 983.207(b) and 983.302(e)]

The HAP contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.

The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year.

There is a single annual anniversary and expiration date for all units under a particular HAP contract, even in cases where contract units are placed under the HAP contract in stages (on different dates) or units are added by amendment. The anniversary and expiration dates for all units coincide with the dates for the contract units that were originally placed under contract.

17-V.E. OWNER RESPONSIBILITIES UNDER THE HAP Contract [24 CFR 983.210]

When the owner executes the HAP contract s/he certifies that at such execution and at all times during the term of the HAP contract:

- All contract units are in good condition and the owner is maintaining the premises and contract units in accordance with HQS;
- The owner is providing all services, maintenance, equipment and utilities as agreed to under the HAP contract and the leases;
- Each contract unit for which the owner is receiving HAP, is leased to an eligible family referred by the PHA, and the lease is in accordance with the HAP contract and HUD requirements;
- To the best of the owner's knowledge the family resides in the contract unit for which the owner is receiving HAP, and the unit is the family's only residence;
- The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit;
- The amount of the HAP the owner is receiving is correct under the HAP contract;
- The rent for contract units does not exceed rents charged by the owner for comparable unassisted units;
- Except for HAP and tenant rent, the owner has not received and will not receive any other payment or consideration for rental of the contract unit;
- The family does not own or have any interest in the contract unit (does not apply to family's membership in a cooperative); and
- Repair work on the project selected as an existing project that is performed after HAP execution within such post-execution period as specified by HUD may constitute development activity, and if determined to be development activity, the repair work

undertaken shall be in compliance with Davis-Bacon wage requirements.

17-V.F. ADDITIONAL HAP REQUIREMENTS

Housing Quality and Design Requirements [24 CFR 983.101(e) and 983.208(a)]

The owner is required to maintain and operate the contract units and premises in accordance with HQS, including performance of ordinary and extraordinary maintenance. The owner must provide all the services, maintenance, equipment, and utilities specified in the HAP contract with the PHA and in the lease with each assisted family. In addition, maintenance, replacement and redecoration must be in accordance with the standard practice for the building as established by the owner.

The PHA may elect to establish additional requirements for quality, architecture, or design of PBV housing. Any such additional requirements must be specified in the Agreement to enter into a HAP contract and the HAP contract. These requirements must be in addition to, not in place of, compliance with HQS.

HACSD Policy

The HACSD will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. The HACSD will specify any special design standards or additional requirements in the invitation for PBV proposals, the agreement to enter into HAP contract, and the HAP contract.

Vacancy Payments [24 CFR 983.352(b)]

At the discretion of the PHA, the HAP contract may provide for vacancy payments to the owner for a PHA-determined period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will be determined by the PHA and cannot exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit).

HACSD Policy

The HACSD will decide on a case-by-case basis if the PHA will provide vacancy payments to the owner. The HAP contract with the owner will contain any such agreement, including the amount of the vacancy payment and the period for which the owner will qualify for these payments.

PART VI: SELECTION OF PBV PROGRAM PARTICIPANTS

17-VI.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

17-VI.B. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

The PHA may select families for the PBV program from those who are participants in the PHA's tenant-based voucher program and from those who have applied for admission to the voucher program. For voucher participants, eligibility was determined at original admission to the voucher program and does not need to be redetermined at the commencement of PBV assistance. For all others, eligibility for admission must be determined at the commencement of PBV assistance.

HACSD Policy

The HACSD will determine an applicant family's eligibility for the PBV program in accordance with the policies in Chapter 3 or as otherwise specified in 24 CFR 983.2

Annual eligibility determination will be made of all families in units receiving project-based assistance.

In-Place Families [24 CFR 983.251(b)]

An eligible family residing in a proposed PBV contract unit on the date the proposal is selected by the PHA is considered an "in-place family." These families are afforded protection from displacement under the PBV rule. If a unit to be placed under contract (either an existing unit or a unit requiring rehabilitation) is occupied by an eligible family on the date the proposal is selected, the in-place family must be placed on the PHA's waiting list. Once the family's continued eligibility is determined (the PHA may deny assistance to an in-place family for the grounds specified in 24 CFR 982.552 and 982.553), the family must be given an absolute selection preference and the PHA must refer these families to the project owner for an appropriately sized PBV unit in the project. Admission of eligible in-place families is not subject to income targeting requirements.

This regulatory protection from displacement does not apply to families that are not eligible to participate in the program on the proposal selection date.

17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the HACSD may use a single waiting list for the HACSD's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

HACSD Policy

The HACSD will establish and manage separate waiting lists for project-based assistance. All those on the regular Section 8 waiting list will be given the opportunity to place their names on the project-based waiting lists. The HACSD may also place families referred by the PBV owner on its PBV waiting list.

If the HACSD determines a need for separate waiting lists, the HACSD will notify the public using one or more of the following methods:

- Notice to current regular Section 8 waiting list applicants;
- Publication in local newspapers to general circulation as well as minority media;
- Facebook postings;
- English and Spanish flyers in County libraries;
- Postings on HACSD's website;
- Twitter blasts to the public;
- County press releases; and
- Community meetings.

The HACSD currently has waiting lists for the following PBV projects:

- One list serves the Pine View complex in Fallbrook and the Vista Terrace complex in Vista. Applicants may designate a specified interest in one or both complexes.
- One list serves the Schmale Family Senior residence in Ramona.
- One list serves The Grove residence in Vista.
- One list serves the Villa de Vida residence in Poway.
- One list serves the Veterans Village San Diego of Escondido (VVSD Escondido) residence.
- One list serves the Villa Lakeshore residence in Lakeside.
- One list serves the El Cajon Seniors residence in El Cajon
- One list serves The Breezewood in Escondido
- One list serves the San Diego Youth Services Johnson Development in El Cajon
- One list serves the Estrella Development in San Marcos
- One list serves the Santa Fe Senior Village in Vista.

17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

Applicants who will occupy units with PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list. The PHA's preference system will work in combination with requirements to match the characteristics for the family to the type of unit available. For example, if a vacancy occurs in a two-bedroom unit, applicants will be selected based on established preferences as well as household size in accordance with subsidy standards.

Income Targeting [24 CFR 983.251(c)(6)]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely low-income families. The income targeting requirement applies to the total of admissions to both programs.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

HACSD Policy

Families will be selected from the waiting list in accordance with HACSD-established selection preferences identified in Chapter 4 of this Plan and/or as included in any MOU/MOA/HAP Contract or Amendments between the HACSD and a PBV provider, and/or as noted in the PBV Exhibits at the end of this chapter.

Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with "excepted units" for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

HACSD Policy

Families selected from the waiting list will be processed for eligibility in conformance with the regulations and the HACSD Section 8 Administrative Plan unless otherwise outlined in this Chapter. Families must meet income targeting guidelines in place at the time of selection from the waiting list. Families denied admission to the project will be returned to the waiting list, if eligible, with the appropriate selection preferences and original date and time of application.

In-place tenants will be given an absolute preference for selection off the HACSD's waiting list for the project. The term "in-place" tenants, means an eligible family residing in a proposed contract unit on the proposal selection date.

A preference may be given for services offered at a particular project and a preference may be given to persons with disabilities whose disabilities significantly interfere with their ability to obtain and maintain themselves in housing; who,

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without such services will not in the future be able to maintain themselves in housing; and for whom such services cannot be provided in a non-segregated community. Disabled residents cannot be required to accept the services being offered. The project may be advertised as being for a particular type of disability; however, the project must be open to all otherwise eligible persons with disabilities who may benefit from the services being offered.

The HACSD may establish selection criteria or preferences for occupancy of particular PBV units. HACSD's preference system will work in combination with requirements to match the characteristics for the family to the type of unit available. For example, if a vacancy occurs in a two-bedroom unit, applications will be selected based on established preferences as well as household size in accordance with subsidy standards.

For Project-Based Voucher (PBV) developments, the HACSD may establish different subsidy standards in order to meet the needs of a particular population or project. The HACSD has established the following subsidy standard for all PBV developments: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

17-VI.E. OFFER OF PBV ASSISTANCE

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 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.

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

Persons with Disabilities

If an applicant family's head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In

addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

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)].

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

HACSD Policy

The owner must notify the PHA in writing (mail, fax, or email) within five business days of learning about any vacancy or expected vacancy.

The PHA will make every reasonable effort to promptly refer a sufficient number of families to the owner to fill vacancies.

Reduction in HAP Contract Units Due to Vacancies [24 CFR 983.254(b)]

If any contract units have been vacant for 120 or more days since owner notice of the vacancy, the PHA may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (according to the bedroom size) that have been vacant for this period. If the PHA amends the contract the PHA will provide notice and the amendment to the HAP contract will be effective the first day of the month following the date of the PHA's notice.

17-VI.G. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. The PHA will not conduct screening to determine a PBV applicant family's suitability for tenancy.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

The PHA may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, or stalking except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(a)(4)].

HACSD Policy

The HACSD will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, at the time of the initial HQS inspection or before. The HACSD will not provide any additional information to the owner, such as tenancy history or criminal history, etc.

The HACSD will inform owners that it is the responsibility of the landlord to determine the suitability of prospective tenants. Owners will be encouraged to screen applicants for rent payment history, payment of utility bills, eviction history, respecting the rights of other residents, damage to units, drug-related criminal activity or other criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

A statement of the HACSD's policy on release of information to prospective landlords is applied uniformly to all families and will be included in the family's briefing packet.

The owner may request the HACSD obtain and review criminal or sex-offender registration records for grounds to deny a tenant application or evict a tenant. The HACSD will charge the owner a fee based on the costs incurred by the HACSD, including the costs charged by the law enforcement agency, the HACSD staff time and administrative costs. The owner may not charge the tenant for this fee.

The HACSD must not release any criminal information or sex-offender information to the owner, but a Housing Supervisor will review the information, and if no information relevant to application or eviction is found, will notify the owner. If information relevant to the application or eviction is found, the Housing Supervisor will present their findings in writing to the Program Coordinator, who will authorize the findings and sign the letter issued to the owner. The letter will not specify the criminal or sex-offender history but will merely state that there may be cause for denial or eviction of the tenant. If the owner sends documentation of needing specific information for an eviction, the Program Coordinator must approve the release of any information in accordance with the regulations [24 CFR 5.903, 24 CFR 5.905].

The HACSD must NEVER release specific personal information to owners regarding their former Section 8 tenants.

Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills;
- Caring for a unit and premises;
- Respecting the rights of other residents to the peaceful enjoyment of their housing;
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and
- Compliance with other essential conditions of tenancy.

PART VII: OCCUPANCY

17-VII.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

17-VII.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

Form of Lease [24 CFR 983.256(b)]

The tenant and the owner must enter into a written lease agreement that is signed by both parties. If an owner uses a standard lease form for rental units to unassisted tenants in the locality or premises, the same lease must be used for assisted tenants, except that the lease must include a HUD-required tenancy addendum. The tenancy addendum must include, word-for-word, all provisions required by HUD.

If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such as a PHA model lease. The tenancy addendum must include, word-for-word, all provisions required by HUD.

The PHA may review the owner's lease form to determine if the lease complies with program requirements.

HACSD Policy

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

Lease Requirements [24 CFR 983.256(c)]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provide by the owner; and
- The amount of any charges for food, furniture, or supportive services.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements;

- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide);
- All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f)]

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g. month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The PHA terminates the HAP contract
- The PHA terminates assistance for the family

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by PHA policy. Per the Administrative Plan, a member of the household is considered permanently absent if the household member is away from the unit for six consecutive months or more in a 12-month period, except as otherwise provided in the Administrative Plan. A sole member is considered permanently absent if absent from the unit for 30 consecutive days. A sole member may be granted an extension of up to 180 consecutive days for medical reasons, as a reasonable accommodation for a disability or a family emergency. PHA termination of assistance actions due to family absence from the unit are subject to 24 CFR 981.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

Continuation of Housing Assistance Payments [24 CFR 982.258]

Housing assistance payments shall continue until the tenant rent equals the rent to owner. The cessation of housing assistance payments at such point will not affect the family's other rights under its lease, nor will such cessation preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within 180 days following the date of the last housing assistance payment by the PHA. After the 180-day period, the unit shall be removed from the HAP contract pursuant to 24 CFR 983.211.

HACSD Policy

If a participating family receiving zero assistance experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the HACSD of the change and request an interim reexamination before the expiration of the 180-day period.

Security Deposits [24 CFR 983.259]

The owner is not required to but is encouraged to collect a full security deposit from the tenant. Security deposits charged by owners may not exceed those charged to unassisted tenants, nor be more than the lessor of legal limitations or the maximum amount indicated on the lease.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

17-VII.C. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260]

If the PHA determines that a family is occupying a wrong size unit, based on the PHA's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the PHA must promptly notify the family and the owner of this determination, and the PHA must offer the family the opportunity to receive continued housing assistance in another unit.

HACSD Policy

In cases where, after initial tenancy, the family is occupying a wrong-sized unit based on the HACSD's subsidy standards or a unit that has accessibility features not required by the family and the unit is needed by a family that requires this accessibility feature, the HACSD will promptly notify the owner and the family of this determination. HACSD will offer the family continued assistance based in the following order, based on the availability of assistance:

PBV assistance in the same building or project;

PBV assistance in another project; and

Tenant-based voucher assistance

If the PHA offers the family a tenant-based voucher, the PHA must terminate the housing assistance payments for a wrong-sized or accessible unit at the earlier of the expiration of the term of the family's voucher (including any extension granted by the PHA) or the date upon which the family vacates the unit. If the family does not move out of the wrong-sized unit or accessible unit by the expiration of the term of the family's voucher, the PHA must remove the unit from the HAP contract.

If the PHA offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the PHA and remove the unit from the HAP contract.

HACSD Policy

When the PHA offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, the HACSD will terminate the housing assistance payments at the expiration of this 30-day period.

The HACSD may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

Family Right to Move [24 CFR 983.261]

The family may terminate the lease at any time after the first year of occupancy. Families may request tenant-based Housing Choice Vouchers after one year from the date that the lease is fully executed. 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 funding permits. 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. At that time, the next available tenant-based Housing Choice Vouchers or other assistance, will be offered to eligible families upon the discretion of the HACSD.

Emergency Transfers under VAWA [Notice PIH 2017-08]

Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

HACSD Policy

When the victim of domestic violence, dating violence, sexual assault, or stalking has lived in the unit for less than one year, the HACSD will provide several options for continued assistance.

The HACSD will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the HACSD has PBV units. The HACSD will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the HACSD's public housing program. Such a decision will be made by the PHA based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. The HACSD has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.

If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the PHA will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the PHA's public housing program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, and stalking as part of the public housing ACOP in order to expedite this process.

17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP [24 CFR 983.262]

As of April 17, 2018, the PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project

If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].

If a family at the time of initial tenancy is receiving and while the resident of an excepted unit has received Family Self-Sufficiency (FSS) supportive services or any other service as defined by the PHA and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit. However, if the FSS family fails to successfully complete the FSS contract of participation

or supportive services objective and consequently is no longer eligible for the supportive services, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA shall cease paying HAP on behalf of the family.

Further, when a family (or remaining members of a family) residing in an excepted unit no longer meets the criteria for a “qualifying family” because the family is no longer an elderly family due to a change in family composition, the PHA has the discretion to allow the family to remain in the excepted unit. If the PHA does not exercise this discretion, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA must cease paying housing assistance payments on behalf of the non-qualifying family.

Individuals in units with supportive services who choose to no longer participate in a service or who no longer qualify for services they qualified for at the time of initial occupancy cannot subsequently be denied continued housing opportunity because of this changed circumstance. A PHA or owner cannot determine that a participant’s needs exceed the level of care offered by qualifying services or require that individuals be transitioned to different projects based on service needs.

If the family fails to vacate the unit within the established time, the unit must be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the building in accordance with program requirements; or the owner terminates the lease and evicts the family. The housing assistance payments for a family residing in an excepted unit that is not in compliance with its family obligations to comply with supportive services requirements must be terminated by the PHA.

The PHA may allow a family that initially qualified for occupancy of an excepted unit based on elderly family status to continue to reside in a unit, where through circumstances beyond the control of the family (e.g., death of the elderly family member or long-term or permanent hospitalization or nursing care), the elderly family member no longer resides in the unit. In this case, the unit may continue to be counted as an excepted unit for as long as the family resides in that unit. Once the family vacates the unit, in order to continue as an excepted unit under the HAP contract, the unit must be made available to and occupied by a qualified family.

HACSD Policy

The HACSD will allow families who initially qualified to live in an excepted unit to remain when circumstances change due to circumstances beyond the remaining family members’ control.

In all other cases, the HACSD will provide written notice to the family and owner upon making the determination that the family no longer qualifies to reside in the excepted unit. The family will be given 90 days from the date of the notice to move out of the PBV unit. The PHA may approve additional extensions upon written request from the family as authorized by the appointing authority. The PHA will provide notification to the family of any decision to approve or deny a request for an extension.

If the family does not move out within this 90-day time frame or subsequent extensions, the PHA will terminate the housing assistance payments at the expiration of this 90-day period.

EXHIBIT 17-8: PBV DEVELOPMENT INFORMATION
VETERANS VILLAGE SAN DIEGO OF ESCONDIDO (VVSD)

DEVELOPMENT INFORMATION

Development Name: Veterans Village San Diego of Escondido-VVSD Escondido

Address: 1540 S. Escondido Blvd, Escondido, CA 92025

HAP CONTRACT

Effective Date of Contract: October 1, 2020

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: September 30, 2040

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units		4*					

Fixed or Floating: Floating

*An additional unit may be added through a contract amendment for a total of 5 units.

Accessible Units and Features: There are seven (7) one-bedroom units equipped with mobility and communication accessibility features and a one (1) bedroom unit that is equipped with adaptable features.

Target Population: Veterans Affairs Supportive Housing (VASH) veterans

Excepted Units: None

Supportive Services: Yes, see Exhibit B of HAP Contract

The voluntary supportive services provided to VASH veterans at VVSD Escondido will be in coordination with VA staff. Provision of comprehensive case management services include individualized services planning and the provision of connections to mental health, substance abuse, employment, health, and housing retention.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves VVSD Escondido.

Preferences: Families will be selected from the waiting list in accordance with VASH program criteria identified in Chapter 19 of this Plan and as included in any MOU/MOA/HAP Contract Amendment between the HACSD and VVSD, including:

- Veterans referred from the Veterans Administration (VA) for Veterans

Administration Supportive Housing (VASH) and having a specified interest in VVSD Escondido

- Veterans referred from the Veterans Administration (VA) for Veterans Administration Supportive Housing (VASH) and having a specified interest in other PBV VASH properties

Preference Verification: Same as HCV VASH; see Chapter 19

Income Limit: See Chapter 19

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric		Owner
Cooking	Electric		Owner
Water Heating	Electric		Owner
Other Electric			Owner
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning			Owner
Refrigerator			Owner
Stove			Owner

EXHIBIT 17-9: PBV DEVELOPMENT INFORMATION
VILLA LAKESHORE

DEVELOPMENT INFORMATION

Development Name: Villa Lakeshore

Address: 12606 Lakeshore Drive, Lakeside, CA 92040

HAP CONTRACT

Effective Date of Contract: 8-1-2021

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: 7-31-2041

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units			25	3			

Fixed or Floating: Fixed

Accessible Units and Features: Villa Lakeshore offers four units that are handicap accessible and one unit that is equipped for the hearing impaired.

Target Population: None

Excepted Units: None

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Villa Lakeshore complex in Lakeside.

Preferences: Same as HCV; Families will be selected in accordance with HACSD established selection preferences identified in Chapter 4 and as included in any MOU/MOA/HAP Contract Amendment between the HACSD and a PBV provider. Villa Lakeshore will have weighted preferences as indicated:

In-Place tenants of Villa Lakeshore at the time of RAD conversion have absolute selection preference and will not be rescreened.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and

spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 4 remain applicable, including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	
Cooking	Electric	Tenant	
Water Heating	Gas		Owner
Other Electric		Tenant	
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning		Tenant	
Refrigerator			Owner
Range/Microwave			Owner

EXHIBIT 17-10: PBV DEVELOPMENT INFORMATION
EL CAJON SENIORS

DEVELOPMENT INFORMATION

Development Name: El Cajon Seniors

Address: 735-739 El Cajon Blvd, El Cajon CA 92120

HAP CONTRACT

Effective Date of Contract: 10/12/2021

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

Expiration Date of Contract: 10/11/2041

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# Of Units		8					

Fixed or Floating: Fixed

Accessible Units and Features: El Cajon Seniors offers accessible and universal design features, including levered door hardware, low-threshold entries and transitions, comfort height commodes, grab bars, and reach-height countertops, switches and receptacles.

The project includes one contract unit with mobility features and one contract unit with communications features.

Target Population: Elderly Veteran Families

Excepted Units: 8

Supportive Services: Yes, see Exhibit B of HAP Contract

Elderly Units: Yes

Disabled Units: No

FUPY/FUP Units: No

Located in a low-poverty census tract area? No

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the El Cajon Seniors complex in El Cajon.

Preferences: Families will be selected from the waiting list in accordance with VASH program criteria identified in Chapter 18 of this Plan and as included in any MOU/MOA/HAP Contract Amendment between the HACSD and El Cajon Seniors,

including:

- Elderly* veterans referred from the Veterans Administration (VA) for Veterans Administration Supportive Housing (VASH) and having a specified interest in El Cajon Seniors
- Elderly* veterans referred from the Veterans Administration (VA) for Veterans Administration Supportive Housing (VASH) and having a specified interest in other PBV VASH properties

The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

*Elderly Families: Families consisting of household members 62 years or older or who meet the “qualified permanent resident” definition under CA Civil Code 51.3.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV; see Chapter 3

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 4 remain applicable, including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Gas		Owner
Cooking	Gas		Owner
Water Heating	Gas		Owner
Other Electric			Owner
Water			Owner
Sewer			Owner
Trash Collection			Owner
Air Conditioning		n/a	n/a
Refrigerator			Owner
Stove			Owner

EXHIBIT 17-11: PBV DEVELOPMENT INFORMATION
THE BREEZEWOOD
KINGDOM DEVELOPMENT INC.

DEVELOPMENT INFORMATION

Development Name: The Breezewood

Address: 1574 S. Escondido Boulevard, Escondido, CA 92025

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 years

Expiration Date of Contract: TBD

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units			14	9			23

Fixed or Floating: Floating

Accessible Units and Features: There are six (6) adaptable units and one (1) unit designated ADA and equipped for visual and hearing impaired.

Target Population: Seven (7) units will be designated for families experiencing homelessness or at risk of experiencing homelessness and contain at least one disabled adult household member.

Excepted Units: 23

Supportive Services: Yes, available to all 23 units, see Exhibit B of the HAP Contract

Kingdom Development, Inc will be the lead service provider and will be responsible for the provision of comprehensive case management services including individualized services planning and the provision of connections to mental health, substance abuse, employment, health, and housing retention. Services are to be available for all households, but voluntary participation.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Breezewood development.

- **Preferences:** Families will be selected from the waiting list in accordance with HACSD established selection preferences identified in Chapter 4 and as indicated in any MOU/MOA/HAP Contract or Amendment between the HACSD and the Breezewood. The Breezewood will have weighted preferences for seven (7) of the units using the following prioritization:
 - Experiencing homelessness or at risk of experiencing homelessness and
 - At least one adult disabled household member
 - Category One for these seven units – Families referred through the Regional Taskforce on Homelessness agency members and meet the definition of homeless and referral criteria, as determined by HACSD/HCDSD programs.
 - Category Two for these seven units – Families selected from the Breezewood waitlist that meet the two identified requirements above and who live or work (see the definition of working families) in the HACSD jurisdiction.
 - Category Three for these seven units – Families selected from the Breezewood waitlist that meet the two identified requirements above.
 - The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.
- The remaining sixteen units will be occupied by households selected from the Breezewood waitlist using the following prioritization:
 - Category One – Families who live or work (see definition of working families) in the HACSD jurisdiction.
 - Category Two – Families who do not live or work (see definition of working families) in the HACSD jurisdiction.
 - The HACSD will not process waiting list applications in a subordinate category before all waiting list applications in a superior category have been processed.

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV: see Chapter 3, except targeted income does not apply to in-place tenants.

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standard guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type	Paid by
Heating	Electric	Tenant
Cooking	Electric	Tenant
Water Heating	Gas	Landlord
Other Electric		Tenant
Water		Landlord
Sewer		Landlord
Trash Collection		Landlord
Air Conditioning		Tenant
Other (Specify)		N/A
		Provided by
Refrigerator		Landlord
Range/Microwave		Landlord

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**EXHIBIT 17-12: PBV DEVELOPMENT INFORMATION
SAN DIEGO YOUTH SERVICES JOHNSON (EL CAJON)**

DEVELOPMENT INFORMATION

Development Name: Johnson (El Cajon)

Address: 302 S. Johnson Avenue, El Cajon, CA 92020

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 Years

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units	4	1					5

Fixed or Floating: Floating

Accessible Units and Features: Facility rooms and common areas are ADA and CA State Title 24 compliant.

Target Population: Transitional aged youth from the ages of 18 to 24 years of age experiencing homelessness or at risk of homelessness.

Excepted Units: 5

Supportive Services: Yes, see Exhibit B of HAP Contract

The voluntary supportive services provided to youth at Johnson (El Cajon) will be in coordination with San Diego Youth Services staff. Provision of comprehensive case management services includes an individualized assessment to develop a strengths-based Life Plan. The Life Plan includes a Service Coordination and Referral Plan to ensure youth have access to all available resources through systems of care.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves Johnson (El Cajon).

Preferences: Families will be selected from the waiting list in accordance with SDYS program criteria as included in any MOU/MOA/HAP Contract Amendment between the HACSD and SDYS, including:

Youth referred from San Diego Youth Services and have a specified interest in Johnson (El Cajon).

Preference Verification: Same as HCV; see Chapter 4

Income Limit: Same as HCV, See Chapter 3, except targeted income does not apply to in-place tenants.

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type	Paid by
Heating	Electric	Owner
Cooking	Electric	Owner
Water Heating	Gas	Owner
Other Electric		Owner
Water		Owner
Sewer		Owner
Trash Collection		Owner
Air Conditioning		Owner
Other (Specify)		N/A
		Provided by
Refrigerator		Owner
Range/Microwave		Owner

Revised 5/2024

EXHIBIT 17-13: PBV DEVELOPMENT INFORMATION
ESTRELLA DEVELOPMENT

DEVELOPMENT INFORMATION

Development Name: Estrella

Address: 604 Richmar Ave., San Marcos, CA 92069

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 years

Expiration of Contract: TBD

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	Total
# of Units		3	7	14		24

Fixed or Floating: Fixed

Accessible Units and Features: The project includes one unit with mobility features, two units with communication features and one unit with mobility and communications features.

Target Population: None

Excepted Units: None

Supportive Services: All residents will have free access to on-site services geared towards families in need. Solari will be providing individualized services planning including but not limited to financial literacy, computer training, resume building, nutrition exercise, health information awareness and parenting. Services are to be available to all households, but participation is voluntary.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves Estrella complex in San Marcos

Preferences: Families will be selected in accordance with the established residency preference identified in Chapter 4 and as included in any MOU/MOA/HAP Contract Agreement between HACSD and PBV provider. Estrella does not have weighted preferences.

Preference Verification: Same as HCV; see Chapter 4.

Income Limit: Same as HCV; see Chapter 3.

Income Targeting: Extremely Low-Income households will be selected from the waitlist.

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standard guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type	Paid by
Heating	Electric	Owner
Cooking	Electric	Owner
Water Heating	Electric	Owner
Other Electric		Owner
Water		Owner
Sewer		Owner
Trash Collection		Owner
Air Conditioning		Owner
Other (Specify)		N/A
		Provided by
Refrigerator		Owner
Range/Microwave		Owner

Revised 9/2024

EXHIBIT 17-14: PBV DEVELOPMENT INFORMATION
SANTA FE SENIOR VILLAGE

DEVELOPMENT INFORMATION

Development Name: Santa Fe Senior Village

Address: 414 North Santa Fe Avenue, Vista, CA 92083

HAP CONTRACT

Effective Date of Contract: TBD

HOTMA Requirements: Post-HOTMA

Term of HAP Contract: 20 years

Expiration of Contract: TBD

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	Total
# of Units	51	2				53

Fixed or Floating: Fixed

Accessible Units and Features: All units at Santa Fe Senior Village are ADA accessible allowing for greater flexibility for residents to age in place. Accessible routes of travel with 34" minimum clear opening width doorways at the unit entry and all interior passage doors. All bathrooms are fully accessible. There will be three ADA mobility units and 2 ADA communication units.

Target Population: Twenty-six units will be designated for families where all household members are 62 years of age or older. Twenty-five units will be designated for homeless or chronically homeless families with at least one member with a diagnosed serious mental illness, where all household members are 62 years of age or older. These units will be referred through Coordinated Entry System (CES) to County Behavioral Health Services (BHS). Two units will be Veterans Affairs Supportive Housing (VASH) program units designated for Veterans referred from the US Department of Veterans Affairs (VA), who have a specified interest in Santa Fe Senior Village and where all household members are 62 years of age or older.

Excepted Units: 53

Supportive Services: Yes, available to all 53 units. Services are to be available for all households, but participation is voluntary.

- Hope Through Housing Foundation services coordinator will provide 1 on 1 case management.
- San Ysidro Health and San Diego Program of All-Inclusive Care for the Elderly (PACE) will provide outreach and engagement and case management services.

Supportive services available based on unit target population:

- County of San Diego's Health and Human Services Agency - Behavioral Health Services (BHS) will be providing direct services for the 25 units referred through CES. BHS will be responsible for the provision of voluntary comprehensive case management services and individualized services for peer support, mental health and substance use, crisis counseling, individual and group therapy, peer support groups, referrals to physical health care, advocacy for services, and housing retention skills.
- The San Diego VA will provide case management and supportive services for VASH units. VASH services are designed to help homeless Veterans and their families obtain permanent housing and access the health care, mental health treatment, and other supports necessary to help them improve their quality of life and maintain housing over time.

WAITING LIST AND SELECTION

Waiting List Type: One waiting list serves the Santa Fe Seniors Village development.

- Preferences: 26 units will be occupied by households selected from the Santa Fe Seniors Village waitlist and as indicated in any MOU/MOA/ HAP Contract or Amendment between HACSD and Santa Fe Senior Village using the following prioritization:
 - Category One – Families selected from the Santa Fe Senior Village meeting the following preference categories, as defined in Chapter 4 of the Admin Plan and as further defined below:
 - Elderly Preference, where all household members must be 62 years of age or older; and
 - HACSD Residency Preference
 - Category Two – Families selected from the Santa Fe Senior Village meeting the following preference categories, as defined in Chapter 4 of the Admin Plan and as further defined below:
 - Elderly Preference, where all household members must be 62 years of age or older.
 - HACSD will not process waiting list applications in subordinate category before all waiting list applications in a superior category has been processed.

Referral Based Units:

- 25 of the units will be filled through referrals from the Coordinated Entry System (CES) for households that meet the following:
 - Homeless or chronically homeless with at least one member with a diagnosed serious mental illness; and
 - Families where all household members are 62 years of age or older
- Two of the units will be filled through referrals from the VA.

Preference Verification: Same as HCV; see Chapter 4.

Income limit: Same as HCV; see Chapter 3.

OCCUPANCY

Subsidy Standards: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standard guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

UTILITY RESPONSIBILITY

Utility	Fuel Type	Paid by
Heating	Electric	Owner
Cooking	Electric	Owner
Water Heating	Electric	Owner
Other Electric		Owner
Water		Owner
Sewer		Owner
Trash Collection		Owner
Air Conditioning		Owner
Other (Specify)		N/A
		Provided by
Refrigerator		Owner
Range/Microwave		Owner

Revised 9/2024

Chapter 18 -PROJECT BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM

INTRODUCTION

This chapter describes HUD regulations and PHA policies related to the Project-Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program in eight parts:

Part I: General Requirements. This part describes general provisions of the PBV program, including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Project Selection. This part describes the cap on assistance at projects receiving PBV assistance, ownership and control, and site selection standards.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution and term of the HAP contract.

Part V: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VI: Occupancy. This part discusses occupancy requirements related to the lease and describes under what conditions families are allowed or required to move.

Part VII: Determining Contract Rent. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract.

Part VIII: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

18-I.A. OVERVIEW AND HISTORY OF THE RAD PROGRAM

The Rental Assistance Demonstration (RAD) program was authorized in 2012 in order to assess the effectiveness of converting public housing, moderate rehabilitation properties, and units under the rent supplement and rental assistance payments programs to long-term, project-based Section 8 rental assistance. The program's four primary objectives are to:

- Preserve and improve public and other assisted housing.
- Standardize the administration of the plethora of federally subsidized housing programs and rules. The conversions are intended to promote operating efficiency by using a Section 8 project-based assistance model that has proven successful and effective for over 30 years. In other words, RAD aligns eligible properties more closely with other affordable housing programs.
- Attract private market capital for property renovations. Through the use of this model, properties may be able to leverage private debt and equity to make capital repairs.
- Increase tenant mobility opportunities.

Under the first component, a PHA with public housing units may submit an application to HUD to convert some or all of their public housing units to long-term, project-based Section 8 HAP contracts under either:

- Project-based rental assistance (PBRA) under HUD's Office of Multifamily Housing Programs.
- Project-based vouchers (PBVs) under HUD's Office of Public and Indian Housing (PIH).

This chapter will focus on public housing conversions to the PBV program under RAD. In order to distinguish between requirements for public housing conversion under RAD and PBV units under the standard PBV program, we will refer to the standard PBV program and the RAD PBV program.

18-I.B. APPLICABLE REGULATIONS

On the whole, the regulations for both the standard and RAD PBV programs generally follow the regulations for the tenant-based HCV program found at 24 CFR Part 982. However, important parts of the tenant-based regulations do not apply to the project-based program. 24 CFR Part 983 outlines the sections of 24 CFR Part 982 that are not applicable to the project-based program.

For the RAD PBV program, Congress authorized HUD to waive certain statutory and regulatory provisions or establish alternative requirements from the standard PBV program. These provisions are identified in Notice PIH 2019-23 (issued September 5, 2019). Any non-RAD PBV units located in the covered project are subject to the same waivers and alternative requirements where noted in Notice PIH 2019-23 and in this policy.

Otherwise, all regulatory and statutory requirements for the standard PBV program in 24 CFR Part 983 and Section 8(o)(13) of the Housing Act of 1937, and all applicable standing and subsequent Office of Public and Indian Housing (PIH) notices and guidance, including related handbooks, apply to RAD PBV. This includes environmental review, Davis-Bacon, and fair housing requirements.

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), as amended by the Consolidated Appropriations Act of 2014 (Public Law 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act of 2015 (Public Law 113-235, approved December 6, 2014), the Consolidated Appropriations Act of 2016 (Public Law 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Public Law 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Public Law 115-141, approved March 23, 2018) collectively, the “RAD Statute.”

Requirements specific to the RAD program may be found in the following:

- Generally, public housing projects converting assistance under RAD are bound by the terms of the notice in effect at the time of closing.
 - Notice PIH 2019-23 was immediately applicable at the time of closing to all projects converting assistance (notwithstanding execution of a commitment for conversion). Notice PIH 2019-23 was published on September 5, 2019.
 - Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period.
 - Notice PIH 2012-32, REV-3 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published January 12, 2017.
 - Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which were effective after a 30-day Notice PIH 2012-32, REV-2 was applicable to projects that were seeking conversion of assistance through RAD, including those where a CHAP had already been issued when it was published June 15, 2015.
 - Except with respect to changes in the project eligibility and selection criteria, not included in this policy, which are effective after a 30-day comment period.
- RAD Quick Reference Guide for Public Housing Converting to PBV Assistance (10/14)
- RAD Welcome Guide for New Awardees: RAD 1st Component (3/15)
- Notice PIH 2016-17, Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions.
 - This Notice applies to all projects that have applied for RAD conversion but have not yet converted as of November 10, 2016.
- Notice PIH 2014-17, Relocation Requirements under the RAD Program, Public Housing in the First Component.
 - This notice may apply to projects that have converted to RAD prior to November 10, 2016, AND who have requested and received approval from HUD to be governed by this notice. See PIH Notice 2016-17, Section 1, Paragraph 1.3 for applicability.

NOTE: The policies in this chapter follow Notice PIH 2016-17. If your project falls under PIH 2014-17, applicable policies may be found in Section 18-I.D.

- RAD FAQs (<http://www.radresource.net/search.cfm>)

HACSD Policy

Project information to be determined.

<u>Project</u>	<u>Closing Date</u>	<u>RAD Notice</u>

In other words, the standard PBV program follows many of the same regulations as the tenant-based HCV program, but not all of them, and the RAD PBV program follows many of the same regulations as the standard PBV program, but not all of them.

MTW agencies are able to apply activities impacting the PBV program that are approved in the MTW Plan to properties converting under RAD, provided they do not conflict with RAD requirements.

18-I.C. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the PHA policies related to tenant-based assistance also apply to RAD PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

HACSD Policy

Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, the PHA policies for the tenant-based voucher program contained in this administrative plan also apply to the RAD PBV program and its participants. This chapter is intended to address requirements specific to the RAD PBV program only.

HACSD has established the following subsidy standard for all PBV developments: One bedroom is assigned for the head of household and spouse/co-head. Additional bedrooms are awarded for each additional two household members. All other subsidy standards guidelines in Chapter 5 remain applicable including requests for a reasonable accommodation.

See Exhibit 18-1 for information on projects to which the PHA has attached RAD PBV assistance.

HACSD policies for RAD PBV will be established when conversion projects are determined.

18-I.D. RELOCATION REQUIREMENTS

For projects that apply for conversion of assistance under the First Component of RAD and will convert November 10, 2016, or later, the following applies [Notice PIH 2016-17]:

- In some developments, in-place residents may need to be relocated as a result of properties undergoing repairs, being demolished and rebuilt, or when assistance is transferred from one site to another. RAD program rules prohibit the permanent, involuntary relocation of residents as a result of conversion. Residents that are

temporarily relocated retain the right to return to the project once it has been completed. Any non-RAD PBV units located in the same project are also subject to the right to return.

- Relocation assistance provided to residents will vary depending on the length of time relocation is required. Residents must be properly notified in advance of relocation requirements in accordance with RAD program rules and Uniform Relocation Act (URA) requirements, and other requirements which may be applicable such as Section 104(d) of the Housing and Community Development Act of 1974, as amended. Sample informing notices are provided in Appendices 2–5 of Notice PIH 2014-17. A written relocation plan is required if the RAD conversion involves permanent relocation (including a move in connection with a transfer of assistance) or temporary relocation anticipated to last longer than a year. While the PHA is not required to have a written relocation plan for temporary relocation lasting one year or less, HUD strongly encourages PHAs to prepare one. Appendix II of Notice PIH 2016-17 contains recommended contents for a relocation plan.
- In addition, PHAs must undertake a planning process that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), although not all relocations under RAD will trigger requirements under URA. URA statute and implementing regulations may be found at 49 CFR Part 24. The obligation due to relocating residents under RAD are broader than URA relocation assistance and payments.
- Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to either: a) a unit at the development once rehabilitation or construction is completed, provided the resident's household is not under-housed; or b) a unit in the development which provides the same major features as the resident's unit in the development prior to the implementation of the RAD conversion.
- Where the transfer of assistance to a new site is warranted and approved, residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete.
- If the PHA's proposed plans for conversion would preclude a resident from returning to the development, the resident must be given an opportunity to comment and/or object to such plans. PHAs must alter the project plans to accommodate the resident's right to return to the development if the resident would be precluded from returning to the development.
- Examples of project plans that may preclude a resident from returning to the development include, but are not limited to:
- Changes in the development's bedroom distribution that decrease the size of the units, resulting in the resident being under-housed;
- The resident cannot be accommodated in the remaining assisted units due to a reduction in the number of assisted units at the development;
- Income limit eligibility requirements associated with the LIHTC program or another program; and
- Failure to provide a reasonable accommodation, in violation of applicable law, where reasonable accommodation may include installation of accessibility features that are needed by the resident.
- Residents of a development undergoing conversion that would be precluded from returning to the development may voluntarily accept a PHA or owner's offer to

permanently relocate to alternative housing, and thereby waive their right to return to the development after rehabilitation or construction is completed. In this event, the PHA must secure the resident's written consent to a voluntary permanent relocation in lieu of returning to the development. PHAs are prohibited from employing any tactics to pressure residents into relinquishing their right to return or accepting other housing options. Additionally, a PHA may not terminate a resident's lease if the PHA fails to obtain the resident's consent and the resident seeks to exercise the right to return.

- In the case of multi-phase RAD transactions, the resident has a right to return to the development or to other converted phases of the development that are available for occupancy at the time the resident is eligible to exercise their right of return. Generally, the resident's right to return must be accommodated within the development associated with the resident's original unit, however, the PHA may treat multiple converted developments on the same site as one for purposes of right to return. Should the PHA seek to have the resident exercise the right to return at a future phase, the PHA must secure the resident's consent in writing.
- Alternative housing options may involve a variety of housing options, including but not limited to:
 - Transfers to public housing
 - Admission to other affordable housing properties subject to the applicable program rules
 - Housing choice voucher (HCV) assistance
 - Homeownership programs subject to the applicable program rules
 - Other options identified by the PHA
- However, for projects that applied for conversion prior to November 10, 2016, the following applies [Notice PIH 2014-17]:
 - In some developments, in-place residents may need to be relocated as a result of properties undergoing repairs, being demolished and rebuilt, or when assistance is transferred from one site to another. RAD program rules prohibit the permanent, involuntary relocation of residents as a result of conversion. Residents that are temporarily relocated retain the right to return to the project once it has been completed.
 - Relocation assistance provided to residents will vary depending on the length of time relocation is required. Residents must be properly notified in advance of relocation requirements in accordance with RAD program rules and Uniform Relocation Act (URA) requirements. Sample informing notices are provided in Appendices 2–5 of Notice PIH 2014-17. While the PHA is not required to have a written relocation plan, HUD strongly encourages PHAs to prepare one. Appendix I of Notice PIH 2014-17 contains recommended contents for a relocation plan.
 - In addition, PHAs must undertake a planning process that complies with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), although not all relocations under RAD will trigger requirements under URA. URA statute and implementing regulations may be found at 49 CFR Part 24.
 - Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved, residents of the converting development will have the right to

reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

18-I.E. EQUAL OPPORTUNITY REQUIREMENTS [24 CFR 983.8; 24 CFR 5.105; Notice PIH 2016-17]

RAD conversions are governed by the same civil rights authorities that govern HUD-assisted activities in general. These authorities prohibit discrimination and impose affirmative obligations on HUD program participants. PHAs must comply with all applicable fair housing and civil rights laws, including but not limited to the Fair Housing Act, Title VI of the Civil Rights Act of 1964, and Section 504 of the Rehabilitation Act of 1973, when conducting relocation planning and providing relocation assistance. For example, persons with disabilities returning to the RAD project may not be turned away or placed on a waiting list due to a lack of accessible units. Their need for an accessible unit must be accommodated. See the *RAD Fair Housing, Civil Rights, and Relocation Notice* [Notice PIH 2016-17] for more information.

PART II: PBV PROJECT SELECTION

18-II.A. OVERVIEW

Unlike in the standard PBV program where the PHA typically selects the property through an owner proposal selection process, projects selected for assistance under RAD PBV are selected in accordance with the provisions in Notice PIH 2019-23. Therefore, 24 CFR 983.51 does not apply since HUD selects RAD properties through a competitive selection process.

18-II.B. OWNERSHIP AND CONTROL [Notice PIH 2019-23]

For projects governed by Notice PIH 2019-23, the following language applies:

- Under the PBV program, the contract administrator and the owner listed on the contract cannot be the same legal entity (i.e., the PHA cannot execute a contract with itself). To avoid this situation, the PHA may either: 1) Transfer the ownership of the project to a nonprofit affiliate or instrumentality of the PHA (including to a “single-purpose entity” that owns nothing other than the property, which will typically be a requirement of a lender or investor), or 2) The PHA can form a related entity that is responsible for management and leasing and can serve as the owner for purposes of the Section 8 HAP contract; in this scenario, the HAP is then executed between the PHA (as the contract administrator) and the PHA’s related entity (as the owner for HAP contract purposes). Note that in the second scenario, both the PHA and the entity serving as the owner for HAP contract purposes will be required to sign the RAD Use Agreement [RAD Resource Desk FAQ 01/24/19].
- Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or nonprofit entity. HUD may also allow ownership of the project to be transferred to a tax credit entity controlled by a for-profit entity to facilitate the use of tax credits for the project, but only if HUD determines that the PHA or a nonprofit entity preserves an interest in the profit. The requirement for a public or nonprofit entity, or preservation of an interest by a PHA or nonprofit in a property owned by a tax credit entity controlled by a for-profit entity, is satisfied if a public or nonprofit entity (or entities), directly or through a wholly owned affiliate (1) holds a fee simple interest in the property; (2) is the lessor under a ground lease with the property owner; (3) has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units, (4) owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable; (5) owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD; (6) owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or (7) demonstrates other ownership and control arrangements approved by HUD.
- Control may be established through the terms of the project owner’s governing documents or through a Control Agreement, provided that in either case amendment of the terms of control requires consent from HUD.
- For projects subject to the requirements of Notice PIH 2012-32, REV-3, the following language applies:

- Except where permitted to facilitate the use of low-income housing tax credits, during both the initial term and renewal terms of the HAP contract, ownership must be by a public or nonprofit entity. The requirement for a public or nonprofit entity is satisfied if a public or nonprofit entity (or entities), directly or through a wholly owned affiliate (1) holds a fee simple interest in the property; (2) is the lessor under a ground lease with the property owner; (3) has the direct or indirect legal authority to direct the financial and legal interest of the property owner with respect to the RAD units, (4) owns 51 percent or more of the general partner interests in a limited partnership or 51 percent or more of the managing member interests in a limited liability company with all powers of a general partner or managing member, as applicable; (5) owns a lesser percentage of the general partner or managing member interests and holds certain control rights as approved by HUD; (6) owns 51 percent or more of all ownership interests in a limited partnership or limited liability company and holds certain control rights as approved by HUD; or (7) other ownership and control arrangements approved by HUD.
- If low-income housing tax credits will be used, HUD may allow ownership of the property to be transferred to a tax credit entity controlled by a for-profit entity if HUD determines that the PHA preserves its interest in the property. Preservation of PHA interest in the property includes but is not limited to the following:
 - The PHA, or an affiliate under its sole control, is the general partner or managing member;
 - The PHA retains fee ownership and leases the real estate to the tax credit entity pursuant to a long-term ground lease;
 - The PHA retains control over leasing the property and determining program eligibility;
 - The PHA enters into a control agreement by which the PHA retains consent rights over certain acts of the project owner and retains certain rights over the project;
 - Other means that HUD finds acceptable
- For projects that converted assistance prior to the implementation of Notice PIH 2012-32, REV-3, the following language applies:
 - During both the initial term and renewal terms of the HAP contract, ownership must be either of the following:
 - A public or nonprofit entity that has legal title to the property. The entity must have the legal authority to direct the financial, legal, beneficial, and other interests of the property; or
 - A private entity, if the property has low-income tax credits. The PHA must maintain control via a ground lease.

18-II.C. PHA-OWNED UNITS [24 CFR 983.59, FR Notice 1/18/17, and Notice PIH 2017-21]

If the project is PHA-owned, rent-setting and inspection functions set out in 24 CFR 983.59 must be conducted by an independent entity approved by HUD.

The definition of *ownership or control* provided under Notice PIH 2019-23 (listed above) is used specifically to determine whether a PHA retains control over a project for purposes of HUD's requirement for ownership or control of the covered project under RAD. For purposes of determining whether an independent entity will perform certain functions for the project, the definition of *PHA-owned* under Notice PIH 2017-21 is used. This is the same definition used for

standard PBV units. In some cases, a project may meet the RAD definition of *ownership or control* but may not be considered PHA-owned for purposes of requiring an independent entity.

The independent entity that performs the program services may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government), or another HUD-approved public or private independent entity.

The PHA may compensate the independent entity from PHA ongoing administrative fee income (including amounts credited to the administrative fee reserve). The PHA may not use other program receipts to compensate the independent entity for its services. The PHA, and the independent entity, may not charge the family any fee for the services provided by the independent entity.

HACSD Policy

Policy will be established when conversion projects are determined.

18-II.D. SUBSIDY LAYERING REQUIREMENTS [Notice PIH 2019-23; Notice PIH 2012-32, REV-3; Notice PIH 2012-32, REV-2]

For projects governed by Notice PIH 2019-23, the following language applies:

- In the case of a PHA that will no longer have ACC units as a result of the pending or simultaneous closing or have less than 50 units remaining and have initiated procedures to dispose of their final ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project or projects though the conversion. However, the PHA must estimate and plan for outstanding liabilities and costs and must follow Notice PIH 2016-23 or successor notice regarding the administrative activities required to terminate the ACC if it has no plans to develop additional public housing.
- In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.
- Following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless those funds have been identified in the RCC and converted at closing for Section 8 RAD purposes.

For projects governed by Notice PIH 2012-32, REV-3, the following language applies:

- In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered projects. In order to cover the cost of administrative activities required to terminate the ACC, once it no longer has units under the ACC and has no plans to develop additional public housing, the PHA may:

Designate that a reserve associated with the project be available to fund any public housing closeout costs (such as an operating deficit reserve or a specific PHA

closeout reserve). Any funds not needed for public housing closeout costs would remain in such reserve or may be transferred to another reserve associated with the project (such as the replacement reserve). Thereafter, these funds may be used at the project pursuant to the authorized use of the applicable reserve; or

Retain funds under the public housing program for this purpose. However, HUD will recapture any public housing funds that a PHA does not expend for closeout costs.

- In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.
- In addition, following execution of the HAP contract, PHAs are authorized to use operating and capital funds to make HAP payments for the remainder of the first calendar year in which the HAP contract is effective. Otherwise, a PHA may not contribute public housing program funds to the covered project unless such funding has been identified in the approved financing plan and included in the approved “sources and uses” attached to the RCC.

For projects governed by the requirements of Notice PIH 2012-32, REV-2, the following language applies:

- In the case of a PHA that is converting all of its ACC units, there is no restriction on the amount of public housing funds that may be contributed to the covered project at closing; the PHA may convey all program funds to the covered project. HUD will recapture any public housing funds that a PHA has not expended once it no longer has units under ACC. In the case where the PHA will continue to maintain other units in its inventory under a public housing ACC, a contribution of operating funds to the covered project that exceeds the average amount the project has held in operating reserves over the past three years will trigger a subsidy layering review under 24 CFR 4.13. Similarly, any contribution of capital funds, including Replacement Housing Factor (RHF) or Demolition Disposition Transitional Funding (DDTF), will trigger a subsidy layering review. Notwithstanding the subsidy layering review, PHAs should be mindful of how the capital funds or operating reserves used in the financing of its RAD properties may impact the physical and financial health of properties that will remain in its public housing inventory.

18-II.E. PBV PERCENTAGE LIMITATION AND UNIT CAP [Notice PIH 2019-23]

PBV Percentage Limitation

Covered projects do not count against the maximum amount of assistance a PHA may utilize for the PBV program, which under the standard PBV program is set at 20 percent of the authorized units allocated to a PHA under the HCV program. To implement this provision, HUD is waiving section 8(o)(13)(B) of the 1937 Act as well as 24 CFR 983.6.

Unit Cap Limitation

PART V: SELECTION OF PBV PROGRAM PARTICIPANTS

18-V.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

18-V.B. PROHIBITED RESCREENING OF EXISTING TENANTS UPON CONVERSION [Notice PIH 2019-23]

Current households cannot be excluded from occupancy at the covered project based on any rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. Post-conversion, the tenure of all residents of the covered project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified by Notice PIH 2019-23 (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family. Existing residents at the time of conversion may not be rescreened for citizenship status or have their social security numbers reverified.

Further, so as to facilitate the right to return to the assisted property, this provision must apply to current public housing residents of the converting project that will reside in non-RAD PBV units placed in a project that contain RAD PBV units. Such families and such contract units will otherwise be subject to all requirements of the applicable program, specifically 24 CFR 983 for non-RAD PBV. Any non-RAD PBV units located in the same project are also subject to the right to return.

For the RAD PBV program, *in-place family* means a family who lived in a pre-conversion property at the time assistance was converted from public housing to PBV under RAD.

18-V.C. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program. Applicants must qualify as a family as defined by HUD and the PHA, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)]. In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to the PHA's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. The PHA may also not approve a tenancy if the owner (including a principal or other interested party) of the unit is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless needed as a reasonable accommodation. An applicant family must also meet HUD requirements related to current or past criminal activity.

HACSD Policy

Policy will be established when conversion projects are determined.

18-V.D. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c); Notice PIH 2019-23]

The standard PBV regulations at 24 CFR 983.251 set out program requirements related to establishing and maintaining a voucher-wide, PBV program-wide, or site-based waiting list from which residents will be admitted. These provisions will apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. Any non-RAD PBV units located in the same project are also subject to these requirements.

HACSD Policy.

Policy will be established when conversion projects are determined.

18-V.E. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

After conversion to RAD PBV, applicants who will occupy units with RAD PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units.

Income Targeting [24 CFR 983.251(c)(6); Notice PIH 2019-23]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

Families in place at the time of the conversion are exempt from income targeting requirements. New admissions follow standard PBV requirements. Any non-RAD PBV units located in the same project are also subject to these requirements.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

Preferences [24 CFR 983.251(d); FR Notice 11/24/08; Notice PIH 2019-23]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units.

HACSD Policy

Policy will be established when conversion projects have been determined.

18-V.F. OFFER OF PBV ASSISTANCE

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:

- Refusing to list the applicant on the waiting list for tenant-based voucher assistance
- Denying any admission preference for which the applicant qualifies

- Changing the applicant's place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA's selection policy
- Removing the applicant from the tenant-based voucher waiting list

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

Persons with Disabilities

If an applicant family's head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

18-V.G. OWNER SELECTION OF TENANTS [24 CFR 983.253]

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.

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

HACSD Policy

Policy will be established when conversion projects are determined.

18-V.H. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, the PHA may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

HACSD Policy

Policy will be established when conversion projects are determined.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

The PHA may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, or stalking, except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(c)].

HACSD Policy

Policy will be determined when conversion projects are determined.

Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills
- Caring for a unit and premises
- Respecting the rights of other residents to the peaceful enjoyment of their housing
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others
- Compliance with other essential conditions of tenancy

PART VI: OCCUPANCY

18-VI.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner, and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

18-VI.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter into a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

The tenant and the owner must enter into a written lease agreement that is signed by both parties. The tenancy addendum must include, word-for-word, all provisions required by HUD.

Lease Requirements [24 CFR 983.256(c); Notice PIH 2019-23]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provided by the owner; and
- The amount of any charges for food, furniture, or supportive services.

The PHA must include resident procedural rights for termination notification and grievance procedures in the owner's lease. These requirements are not part of the regular PBV program but are required under RAD.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements
- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide)

All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f); *PBV Quick Reference Guide* 06/20]

Leases for residents who will remain in place (i.e., who will not be relocated solely as a result of conversion) must have an effective date that coincides with—and must be signed on or before—the effective date of the RAD PBV HAP contract.

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g., month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The PHA terminates the HAP contract
- The PHA terminates assistance for the family

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257; Notice PIH 2019-23]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Projects converting from public housing to PBV under RAD have additional procedural rights that do not apply to the standard PBV program. These procedural rights must be included in the owner’s lease as well as the PHA’s administrative plan. In addition to the regulations at 24 CFR 983.257 related to project owner termination of tenancy and eviction (which MTW agencies may not alter) the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease, which may not be less than:

- A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction
- Not less than 14 days in the case of nonpayment of rent
- Not less than 30 days in any other case, except that if a state or local law provides for a shorter period of time, such shorter period will apply

These provisions apply to non-RAD PBV units located in the project as well.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by PHA policy. According to program requirements, the family's assistance must be terminated if they are absent from the unit for more than 180 consecutive days. PHA termination of assistance actions due to family absence from the unit are subject to 24 CFR 982.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

Continuation of Housing Assistance Payments [24 CFR 983.258; Notice PIH 2019-23]

Current residents living in the property prior to conversion are placed on and remain under the HAP contract when TTP equals or exceeds gross rent. In this case, until such time as the family's TTP falls below the gross rent, the family will pay the owner the lesser of their TTP minus the utility allowance or any applicable maximum rent under the LIHTC program. The family will continue to pay this amount until/if circumstances change, and HAP is paid on their behalf. In other words, assistance may subsequently be reinstated if the tenant becomes eligible for assistance. In such cases, the resident is still considered a program participant. All of the family obligations and protections under RAD and standard PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP contract. Any non-RAD PBV units located in the same project are also subject to these requirements.

Unless a waiver is requested and approved, following conversion, 24 CFR 983.53(d) applies, and any new admission referred to the RAD PBV project must be initially eligible for a HAP payment at admission to the program. The PHA may request a waiver from HUD in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not paid HAP for the family in 180 days.

Further, for any new families admitted after the conversion, assistance will be terminated 180 days after the last housing assistance payment on their behalf. The cessation of housing assistance payments does not affect the family's other rights under its lease, nor does it preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within the 180-day window. If a family's assistance is terminated as a result of their zero HAP status, the PHA must remove the unit from the HAP contract. If the project is fully assisted, the PHA must reinstate the unit after the family has vacated the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR 983.207.

HACSD Policy

Policy will be established when conversion projects have been determined.

Security Deposits [24 CFR 983.259; *PBV Quick Reference Guide 10/14*]

Owners are permitted to recognize security deposit amounts that have been previously provided by tenants who are in-place at the time of the RAD conversion. Otherwise the security deposit requirements for standard PBV apply.

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

HACSD Policy

Policy will be established when conversion projects are determined.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as

reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

18-VI.C. PUBLIC HOUSING FSS AND ROSS PARTICIPANTS [Notice PIH 2019-23]

Current PH FSS participants will continue to participate in the PHA's FSS program, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the current fiscal year (FY) PH FSS notice of funding availability (NOFA) to serve those FSS participants who live in units converted to RAD and who will as a result be moving to the HCV FSS program. A PHA must convert the PH FSS program participants at the covered project to their HCV FSS program.

Residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant's failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties.

At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will continue to be eligible (subject to NOFA requirements) to apply for FSS funding.

Current Resident Opportunities and Self-Sufficiency–Service Coordinators (ROSS–SC) program grantees will be able to finish out their current ROSS–SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing ROSS–SC grants.

At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a nonprofit or local resident association and this consequence of a RAD conversion may impact those entities.

Any non-RAD PBV units located in the same project are also subject to these requirements.

18-VI.D. RESIDENT PARTICIPATION AND FUNDING [Notice PIH 2019-23]

Residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

18-VI.E. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260; Notice PIH 2019-23]

All in-place tenants at the time of conversion are eligible to remain in the project. Over-housed families should be moved into appropriately sized units if such units are available in the new or rehabbed project. If appropriately sized units are not available, the existing tenants may continue to be over-housed until an appropriately sized unit becomes available or until the tenant leaves

to establish a turnover cap and the cap is implemented, the PHA must create and maintain a waiting list in the order requests from eligible households were received.

HACSD Policy

Policy will be established when conversion projects are determined.

Emergency Transfers under VAWA [Notice PIH 2017-08]

Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

HACSD Policy

Policy will be established when conversion projects are determined.18-VI.F.
REEXAMINATIONS [*PBV Quick Reference Guide* 10/14]

A family living in a unit converted from public housing to RAD PBV may retain its certification date. Unless a family's annual reexamination is due at the same time as the effective date of the RAD PBV HAP contract, the PHA does not need to recertify tenants at the point of conversion. For each family residing in a unit undergoing conversion of assistance under RAD, the administering PHA will have to submit a form HUD-50058 reflecting the family's admission to the voucher program. The effective date of the new admission will be the same as the effective date of the RAD PBV HAP contract. The form should include the same information previously found on the public housing form 50058, including the next annual reexamination date.

18-VI.G. EARNED INCOME DISALLOWANCE [Notice PIH 2019-23]

Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR 5.617. Upon the expiration of the EID for such families, the rent adjustment will not be subject to rent phase-in; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. Any non-RAD PBV units located in the same project are also subject to these requirements.

Under the HCV program, the EID exclusion is limited to only persons with disabilities [24 CFR 5.617(b)]. In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only persons with disabilities is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant, such as tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment), tenants that move into the property following conversion, etc., is covered by this waiver.

18-VI.H. RESIDENTS' PROCEDURAL RIGHTS [Notice PIH 2019-23]

HUD is incorporating additional termination notification requirements for public housing projects that convert assistance under RAD to PBV and to non-RAD PBV units located in the same project beyond those for the standard PBV program. In addition to the regulations at 24 CFR 983.257 related to owner termination of tenancy and eviction (which MTW agencies may not alter), the

termination procedure for RAD conversions to PBV requires that PHAs provide adequate written notice of termination of the lease, which is:

- A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, project owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction.
- Not less than 14 days in the case of nonpayment of rent
- Not less than 30 days in any other case, except that if a state or local law provides for a shorter period of time, such shorter period will apply

18-VI.I. INFORMAL REVIEWS AND HEARINGS [Notice PIH 2019-23]

In addition to reasons for an informal hearing listed at 24 CFR 982.555(a)(1)(i)–(v) (See 16-III.C. Informal Hearings for Participants), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to an owner action in accordance with the individual’s lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident’s rights, obligations, welfare, or status.

- For any hearing required under 24 CFR 982.555(a)(1)(i)–(v), the contract administrator will perform the hearing in accordance with Chapter 16 Part III: Informal Reviews and Hearings, as is the current standard in the program.
- For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.

An informal hearing will not be required for class grievances or for disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement does not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.

The owner must give residents notice of their ability to request an informal hearing as outlined in 24 CFR 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR 982.555(a)(1)(i)–(v). (See Chapter 16)

The owner must provide an opportunity for an informal hearing before an eviction.

Chapter 19 - SPECIAL PROGRAMS and SPECIAL PURPOSE VOUCHERS

INTRODUCTION

This chapter contains information about the HACSD's special programs and special purpose vouchers, including any special claims allowed by the program. A family may choose to rent other eligible housing in accordance with the requirements of the specific program.

Special purpose vouchers are specifically funded by Congress as separate appropriations from regular HCV program funding in order to target specific populations. Special purpose vouchers administered by HACSD include vouchers for the following programs:

- Family Unification Program (FUP)
- Veterans Affairs Supportive Housing (VASH)
- Mainstream Voucher Program
- Emergency Housing Voucher (EHV) program

Special Programs are tenant-based rental assistance programs, operated in community partnership, that generally follow the provisions of the Housing Choice Voucher (HCV) program. These grant programs expand opportunities for vulnerable individuals and families to access quality affordable rental homes. Special programs administered by HACSD include:

- Moderate Rehabilitation Program (MOD REHAB)
- Housing Opportunities for People with AIDS (HOPWA)
- HOME Tenant-Based Rental Assistance (TBRA)

This chapter describes HUD regulations and PHA policies for administering special purpose vouchers and other designated special programs. The policies outlined in the chapter are organized into six sections, as follows:

Part I: Mainstream Voucher Program

Part II: Moderate Rehabilitation Program

Part III: HOPWA

Part IV: VASH

Part V: Family Unification Program (FUP)

Part VI: Emergency Housing Voucher (EHV) Program

Part VII: HOME Tenant-Based Rental Assistance (TBRA) Program

Except as addressed by this chapter and as required under federal statute and HUD requirements, the general requirements of the HCV program apply to special purpose and special program vouchers.

PART I: MAINSTREAM VOUCHER PROGRAM
[24 CFR 982]

19-I.A. PROGRAM OVERVIEW [Notice PIH 2020-01]

Mainstream vouchers assist non-elderly persons with disabilities and their families in the form of either project-based or tenant-based voucher assistance.

Aside from separate funding appropriations and serving a specific population, Mainstream vouchers follow the same program requirements as standard vouchers. The PHA does not have special authority to treat families that receive a Mainstream voucher differently from other applicants and participants. For example, the PHA cannot apply different payment standards, establish conditions for allowing portability, or apply different screening criteria to Mainstream families.

Existing families issued Mainstream Vouchers prior to 2019 have different eligibility criteria than 2019 Mainstream vouchers.

Mainstream vouchers that were issued prior to the 2019 Appropriation Act clarification are designated for disabled families (head, spouse, or sole member is disabled).

HACSD assists the families on this program with resource referrals and provides additional assistance to the families to enable them to obtain and retain assisted housing.

Unless otherwise noted, these vouchers are administered in conformance with this Plan.

19-I.B. ELIGIBLE POPULATION [Notice PIH 2020-22]

All Mainstream vouchers must be used to serve non-elderly persons with disabilities and their families, defined as any family that includes a person with disabilities who is at least 18 years old and not yet 62 years old as of the effective date of the initial HAP contract. The eligible disabled household member does not need to be the head of household.

The definition of person with disabilities for purposes of Mainstream vouchers is the statutory definition under section 3(b)(3)(E) of the 1937 Act, which is the same as is used for allowances and deductions in the HCV program and is provided in Exhibit 3-1 of this policy.

Existing families receiving Mainstream vouchers, where the eligible family member is now age 62 or older, will not “age out” of the program as long as the family was eligible on the day it was first assisted under a HAP contract.

The PHA may not implement eligibility screening criteria for Mainstream vouchers that is different from that of the regular HCV program.

19-I.C. PARTNERSHIP AND SUPPORTIVE SERVICES [Notice PIH 2020-01]

PHAs are encouraged but not required to establish formal and informal partnerships with a variety of organizations that assist persons with disabilities to help ensure eligible participants find and maintain stable housing.

HACSD Policy

HACSD will implement a Mainstream program in partnership with the County of San Diego, Health and Human Services Agency, under a special local preference in accordance with Chapter 4-III.C. of this Plan.

Applications may be received from the applicant or on behalf of the applicant by the County of San Diego, Health and Human Services Agency and will be placed on the HCV waitlist as of the date and time of the application or referral.

19-I.D. WAITING LIST ADMINISTRATION

General Waiting List Requirements [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

PHAs must not have a separate waiting list for Mainstream voucher assistance since the PHA is required by the regulations to maintain one waiting list for tenant-based assistance [24 CFR 982.204(f)]. All PHA policies on opening, closing, and updating the waiting list, as well as waiting list preferences in Chapter 4, apply to the Mainstream program.

When the PHA is awarded Mainstream vouchers, these vouchers must be used for new admissions to the PHA's program from the waiting list. The PHA must lease these vouchers by pulling the first Mainstream-eligible family from its tenant-based waiting list. PHAs are not permitted to reassign existing participants to the program in order to make regular tenant-based vouchers available. Further, the PHA may not skip over Mainstream-eligible families on the waiting list because the PHA is serving the required number of Mainstream families.

Upon turnover, vouchers must be provided to Mainstream-eligible families. If a Mainstream turnover voucher becomes available, the PHA must determine if the families at the top of the waiting list qualify under program requirements.

Admission Preferences [Notice PIH 2020-01; FY17 Mainstream Notice of Funding Availability (NOFA); FY19 Mainstream NOFA]

If the PHA claimed points for a preference in a NOFA application for Mainstream vouchers, the PHA must adopt a preference for at least one of the targeted groups identified in the NOFA.

HACSD Policy

HACSD claimed a preference for a targeted group as part of an application for Mainstream vouchers under a NOFA. The PHA will offer the following preference for 138 vouchers (see 4-III.C).

- 1) *Exiting an Institution or Segregated Setting; or***
- 2) *Homeless***

Mainstream vouchers awarded in addition to the 138 initial vouchers are not subject to targeted preferences and will be pulled directly from the HCV waiting list based on the eligible population as indicated in 19-I.B. and the policies outlined in Chapter 4.

Admission Preferences

HACSD applies local preferences in determining the order in which Mainstream Vouchers are awarded to eligible families as referenced in Chapter 4.

DEFINITIONS

If the applicant meets the criteria for special local preference category 4 the following definitions and verification apply:

Institution or Segregated Setting

An institution or segregated setting is defined as a mental institution or hospital setting.

Verification

For verification of institutionalization or other segregated settings, the HACSD will accept a statement from a medical professional who is familiar with the applicant and who can attest that the individual would be able to live on their own if housing assistance and other resources were available.

The individual must have been in residence in the segregated setting for at least 30 days, and has either;

1. Exited within 90 days from the selection date, or;
2. Will exit within 30 days of being selected from the waiting list.

Homeless

Applicants must meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3. at the time of selection.

Verification

For verification of homelessness, the HACSD will accept appropriate documentation listed under 24 CFR 582.301.

Accommodations

Mainstream voucher holders in both programs are provided with resources regarding unit accessibility and any other needs requested in order to fully utilize the program.

Mainstream voucher holders have the same bedroom payment standard as with the HCV program and may request a higher payment standard if needed as a reasonable accommodation to fully utilize the program. See Chapter 2 for reasonable accommodation policies and procedures.

19-I.E. PORTABILITY

[Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

Mainstream voucher participants are eligible for portability under standard portability rules and all PHA policies regarding portability in Chapter 10, Part II apply to Mainstream families.

The following special considerations for Mainstream vouchers apply under portability:

- If the receiving PHA has a Mainstream voucher available, the participant may remain a Mainstream participant.
 - If the receiving PHA chooses to bill the initial PHA, then the voucher will remain a Mainstream voucher.
 - If the receiving PHA chooses to absorb the voucher, the voucher will be considered a regular voucher, or a Mainstream voucher if the receiving PHA has a Mainstream voucher available, and the Mainstream voucher at the initial PHA will be freed up to lease to another Mainstream-eligible family.
- If the receiving PHA does not have a Mainstream voucher available, the participant may receive a regular voucher.

19-I.F. PROJECT-BASING MAINSTREAM VOUCHERS

[FY19 Mainstream Voucher NOFA Q&A]

The PHA may project-base Mainstream vouchers in accordance with all applicable PBV regulations and PHA policies in Chapter 17. PHAs are responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable federal nondiscrimination and civil rights statutes and requirements. This includes, but is not limited to, Section 504 of the Rehabilitation Act (Section 504), Titles II or III of the Americans with Disabilities (ADA), and the Fair Housing Act and their implementing regulations at 24 CFR Part 8; 28 CFR Parts 35 and 36; and 24 CFR Part 100. Mainstream vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A.

PART IV: VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH)

[24 CFR 982]

19-IV.A. OVERVIEW

Since 2008, HCV program funding has provided rental assistance under a supportive housing program for homeless veterans. The Veterans Affairs Supportive Housing (VASH) program combines HCV rental assistance with case management and clinical services provided by the Department of Veterans Affairs (VA) at VA medical centers (VAMCs) and Community-Based Outpatient Clinics (CBOCs), or through a designated service provider (DSP) as approved by the VA Secretary. Eligible families are homeless veterans and their families that agree to participate in VA case management and are referred to the VAMC's partner PHA for HCV assistance. The VAMC or DSP responsibilities include:

- Screening homeless veterans to determine whether they meet VASH program participation criteria;
- Referring homeless veterans to the PHA;
- The term homeless veteran means a veteran who is homeless (as that term is defined in subsection (a) or (b) of Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)). See 38 U.S.C. 2002.
- Providing appropriate treatment and supportive services to potential VASH participants, if needed, prior to PHA issuance of a voucher;
- Providing housing search assistance to VASH participants;
- Identifying the social service and medical needs of VASH participants, and providing or ensuring the provision of regular ongoing case management, outpatient health services, hospitalization, and other supportive services as needed throughout the veterans' participation period; and
- Maintaining records and providing information for evaluation purposes, as required by HUD and the VA.

Generally, the HUD-VASH program is administered in accordance with regular HCV program requirements. However, HUD is authorized to waive or specify alternative requirements to allow PHAs to effectively deliver and administer VASH assistance. Alternative requirements are established in the HUD-VASH Operating Requirements, which were originally published in the Federal Register on May 6, 2008, and updated September 27, 2021. Unless expressly waived by HUD, all regulatory requirements and HUD directives regarding the HCV program are applicable to VASH vouchers, including the use of all HUD-required contracts and other forms, and all civil rights and fair housing requirements. In addition, the PHA may request additional statutory or regulatory waivers that it determines are necessary for the effective delivery and administration of the program.

On October 25, 2023, HUD approved waivers and alternative requirements for income, assets, and other documentation at admission. The waivers and alternative requirements are documented below.

The VASH program is administered in accordance with applicable Fair Housing requirements since civil rights requirements cannot be waived under the program. These include applicable authorities under 24 CFR 5.105(a) and 24 CFR 982.53 including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964,

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the Americans with Disabilities Act, and the Age Discrimination Act and all PHA policies as outlined in Chapter 2 of this document.

When HUD-VASH recipients include veterans with disabilities or family members with disabilities, reasonable accommodation requirements in Part II of Chapter 2 of this policy apply.

19-IV.B. REFERRALS [FR Notice 9/27/21 and HUD-VASH Qs and As]

VAMC case managers will screen all families in accordance with VA screening criteria and refer eligible families to the PHA for determination of program eligibility and voucher issuance. The PHA has no role in determining or verifying the veteran's eligibility under VA screening criteria, including determining the veteran's homelessness status. The PHA must accept referrals from the partnering VAMC and must maintain written documentation of referrals in VASH tenant files. Upon turnover, VASH vouchers must be issued to eligible veteran families as identified by the VAMC.

HACSD Policy

In order to expedite the screening process, HACSD will provide all forms and a list of documents required for the VASH application to the VAMC. Case managers will work with veterans to fill out the forms and compile all documents prior to submitting an application to HACSD. After the VAMC has given HACSD a complete referral, HACSD will perform an eligibility screening.

19-IV.C. HCV PROGRAM ELIGIBILITY [FR Notice 9/27/21]

Eligible participants are homeless veterans and their families who agree to participate in case management from the VAMC.

- A VASH Veteran or veteran family refers to either a single veteran or a veteran with a household composed of two or more related persons. It also includes one or more eligible persons living with the veteran who are determined to be important to the veteran's care or well-being.
- A veteran for the purpose of VASH is a person whose length of service meets statutory requirements, and who served in the active military, naval, or air service, was discharged or released under conditions other than dishonorable, and is eligible for VA health care.

Under VASH, PHAs do not have authority to determine family eligibility in accordance with HCV program rules and PHA policies. The only reasons for denial of assistance by the PHA are failure to meet the income eligibility requirements and/or that a family member is subject to a lifetime registration requirement under a state sex offender registration program. Under portability, the receiving PHA must also comply with these VASH screening requirements.

Social Security Numbers

When verifying Social Security numbers (SSNs) for homeless veterans and their family members, an original document issued by a federal or state government agency, which contains the name and SSN of the individual along with other identifying information of the individual, is acceptable in accordance with Section 7-II.B. of this policy.

In the case of the homeless veteran, the PHA must accept the Certificate of Release or Discharge from Active Duty (DD-214) or the VA-verified Application for Health Benefits (10-10EZ) as verification of SSN and cannot require the veteran to provide a Social Security card. A VA-issued identification card may also be used to verify the SSN of a homeless veteran.

HACSD Policy

In accordance with HUD approved waiver, HACSD may accept a self-certification of a family member's SSN and a third-party document with the applicant's name printed on it to satisfy this requirement, provided that the PHA first asks for the required documentation. Additionally, there is no requirement that the document be dated within a certain time frame.

If the HACSD uses this option, they must document in the tenant file why self-certification was used. HACSD must review the *Failed Social Security Administration (SSA) Identify Report* to identify participants whose identity is not verified. If after 120 days, the participant's SSN is verified in EIV, no further verification is required.

If the participant's SSN is not verified in EIV, the family must provide documentation as required under 24 CFR 5.216(g)(i). If the participant does not provide documentation of SSN nor is verified in EIV, the HACSD must terminate the case in accordance with termination policy found at 12-I.D.

Proof of Age

The DD-214 or 10-10EZ must be accepted as proof of age in lieu of birth certificates or other PHA-required documentation as outlined in Section 7-II.C. of this policy. A VA-issued identification card may also be used to verify the age of a homeless veteran.

HACSD Policy

In accordance with HUD approved waiver of 24 CFR 982.201(e), HACSD may accept self-certification of date of birth and obtain higher level documentation within 90 days of admission or upon verification of information in EIV with respect to verifying the family's elderly status and the impact that determination has on the family's eligible expenses and deductions.

Photo Identification

A VA-issued identification card must be accepted in lieu of another type of government-issued photo identification. These cards also serve as verification of SSNs and date of birth.

Income Eligibility

The PHA must determine income eligibility for VASH families in accordance with 24 CFR 982.201 and policies in Section 3-II.A. If the family is over-income based on the most recently published income limits for the family size, the family will be ineligible for HCV assistance.

While income-targeting does not apply to VASH vouchers, the PHA may include the admission of extremely low-income VASH families in its income targeting numbers for the fiscal year in which these families are admitted.

HACSD Policy

Income-targeting requirements of section 16(b) of the 1937 Act, as well as 24 CFR 982.201(b)(2), do not apply for HUD-VASH families. The HACSD will serve homeless veterans at a variety of income levels, including extremely low (30% AMI) very low (50% AMI), and low-income (80% AMI).

While income-targeting requirements will not be considered by HACSD when families are referred by the partnering VAMC, HACSD will include any extremely low-income VASH families that are admitted in its income targeting numbers for the fiscal year in which these families are admitted.

In accordance with HUD approved waiver of 24 CFR 982.201(e) the HACSD may accept an original or authentic document generated by a third-party source dated within the period of 120 days before the HACSD issues a voucher to the applicant to verify income.

In accordance with HUD approved waiver HACSD may immediately allow self-certification of applicant's income provided they first requested third-party documentation from the family. HACSD is not required to attempt to first obtain the documentation from the third-party source prior to allowing self-certification. Applicants must submit a self-certification declaration of income, assets and expenses, and other factors that would otherwise affect income eligibility determination with a period of 60 days prior to voucher issuance.

The HACSD must receive information verifying that the applicant is eligible with a period of 60 days after the execution of the HAP contract.

The adoption of this waiver does not authorize ineligible families to receive assistance under HUD-VASH or relieve the HACSD of its responsibilities to correct any overpayments or underpayments. The HACSD must resolve income discrepancies, including updating a family's income retroactive to the New Admission. If a family is determined to be ineligible the HACSD must take actions to terminate the family from the program.

Asset Eligibility

HACSD Policy

In accordance with HUD approved waiver of 24 CFR 982.516(a)(3) the HACSD may accept self-certification of assets and asset income when the value of the assets is \$10,000 or less for applicants at initial eligibility determination and lease-up.

Disability Verification

HACSD Policy

In accordance with HUD approved waiver of 24 CFR 981.201(e) the HACSD may accept self-certification of a veteran family's disability status and the impact that determination has on the family's eligible expenses and deductions when third-party verification is not immediately available. The HACSD must verify the disability status within 90 days after admission.

Screening

The PHA may not screen any potentially eligible family members or deny assistance for any grounds permitted under 24 CFR 982.552 and 982.553 with one exception: the PHA is still required to prohibit admission if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program. Accordingly, with the exception of denial for registration as a lifetime sex offender under state law and PHA policies on how sex offender screenings will be conducted, PHA policy in Sections 3-III.B. through 3-III.E. do not apply to VASH. The prohibition against screening families for anything other than lifetime sex offender status applies to all family members, not just the veteran.

If a family member is subject to lifetime registration under a state sex offender registration program, the remaining family members may be served if the family agrees to remove the sex offender from its family composition. This is true unless the family member is the homeless veteran, in which case the family would be denied admission to the program [[New HCV GB, HUD VASH](#), p. 6].

Denial of Assistance [Notice PIH 2008-37]

Once a veteran is referred by the VAMC, the PHA must either issue a voucher or deny assistance. If the PHA denies assistance, it must provide the family with prompt notice of the decision and a brief statement of the reason for denial in accordance with Section 3-III.F. As in the standard HCV program, the family must be provided with the opportunity for an informal review in accordance with policies in Section 3-III.F. A copy of the denial notice must be sent to the VAMC case manager.

19-IV.D. CHANGES IN FAMILY COMPOSITION

Adding Family Members [FR Notice 9/27/21]

When adding a family member after the family has been admitted to the program, PHA policies in Section 3-II.B. apply. Other than the birth, adoption, or court-awarded custody of a child, the PHA must approve additional family members and will apply its regular screening criteria in doing so.

Remaining Family Members [HUD-VASH Qs and As]

If the homeless veteran dies while the family is being assisted, the voucher would remain with the remaining members of the tenant family. The PHA may use one of its own regular vouchers, if available, to continue assisting this family and free up a VASH voucher for another VASH-eligible family. If a regular voucher is not available, the family would continue utilizing the VASH voucher. Once the VASH voucher turns over, however, it must go to a homeless veteran family.

Family Break Up [HUD-VASH Qs and As]

In the case of divorce or separation, since the set-aside of VASH vouchers is for veterans, the voucher must remain with the veteran. This overrides the PHA's policies in Section 3-I.C. on how to determine who remains in the program if a family breaks up.

See section 19-IV.H. of this chapter for VAWA provisions.

19-IV.E. LEASING [FR Notice 9/27/21]

Waiting List

The PHA does not have the authority to maintain a waiting list or apply local preferences for HUD–VASH vouchers. Policies in Chapter 4 relating to applicant selection from the waiting list, local preferences, special admissions, cross-listing, and opening and closing the waiting list do not apply to VASH vouchers.

Voucher Issuance

Unlike the standard HCV program which requires an initial voucher term of at least 60 days, VASH vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Section 5-II.E. will apply.

HACSD Policy

All VASH vouchers will have an initial term of 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

The PHA must track issuance of HCVs for families referred by the VAMC or CBOC in PIC as required in Notice PIH 2011-53.

Initial Lease Term

Unlike in the standard the HCV program, VASH voucher holders may enter into an initial lease that is for less than 12 months. Accordingly, PHA policy in Section 9-I.E., Term of Assisted Tenancy, does not apply.

Ineligible Housing [FR Notice 6/18/14]

Unlike in the standard HCV program, VASH families are permitted to live on the grounds of a VA facility in units developed to house homeless veterans. This applies to both tenant-based assistance and PBV. Therefore, 24 CFR 982.352(a)(5) and 983.53(a)(2), which prohibit units on the physical grounds of a medical, mental, or similar public or private institution, do not apply to VASH for this purpose only. Accordingly, PHA policy in 9-I.D., Ineligible Units, does not apply for this purpose only.

HQS Pre-Inspections

To expedite the leasing process, PHAs may pre-inspect available units that veterans may be interested in leasing in order to maintain a pool of eligible units. If a VASH family selects a unit that passed an HQS inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval (Form HUD-52517), the unit may be approved if it meets all other conditions under 24 CFR 982.305. However, the veteran must be free to select their unit and cannot be steered to these units.

HACSD Policy

To expedite the leasing process, HACSD may pre-inspect available units that veterans may be interested in leasing to maintain a pool of eligible units. If a VASH family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval (form HUD-52517), the unit may be approved provided that it meets all other conditions under 24 CFR 982.305. The veteran will be free to select their unit.

When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for both initial and any required reinspections.

19-IV.F. RENT CALCULATION

Exception Payment Standards [86 FR 53207 9/27/21; 24 CFR 983.301]

HUD is waiving 24 CFR 982.503(a)(3) to allow a PHA to establish a HUD-VASH exception payment standard. Additionally, 982.503(b)(iii) is waived so that PHAs may go up to, but no higher than 120 percent of the published metropolitan area-wide FMRs or Small Area FMRs specifically for HUD-VASH families. A PHA that wants to establish a HUD-VASH exception payment standard over 120 percent must still request a waiver from HUD through the regular waiver process outlined in notice PIH 2018-16, or any successor notices. Exception payment standards implemented by the PHA under this Section also apply in determining rents for PBV projects with units exclusively made available to HUD-VASH families.

HACSD Policy

HUD-VASH payment standards of 120% of HUD's current Small Area Fair Market Rent (SAFMR) will be applied to one-, two-, and three-bedroom units.

19-IV.G. PORTABILITY [FR Notice 9/27/21 and Notice PIH 2011-53]

General Requirements

Portability policies under VASH depend on whether the family wants to move within or outside of the initial VA facility's catchment area (the area in which the VAMC or DSP operates). In all cases, the initial VA facility must be consulted prior to the move and provide written confirmation that case management will continue to be provided in the family's new location. VASH participant families may only reside in jurisdictions that are accessible to case management services, as determined by case managers at the partnering VAMC or DSP.

Under VASH, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied. As a result, PHA policies in Section 10-II.B. about nonresident applicants do not apply.

If the family no longer requires case management, there are no portability restrictions. Normal portability rules apply.

Portability within the Initial VAMC or DSP's Catchment Area

A VASH family can move within the VAMC's catchment area as long as case management can still be provided, as determined by the VA. If the initial PHA's partnering VAMC will still provide the case management services, the receiving PHA must process the move in accordance with portability procedures:

- If the receiving PHA has been awarded VASH vouchers, it can choose to either bill the initial PHA or absorb the family if it has a VASH voucher available to do so.
- If the PHA absorbs the family, the VAMC or DSP providing the initial case management must agree to the absorption and the transfer of case management.
- If the receiving PHA does not administer a VASH program, it must always bill the initial PHA.

Portability Outside of the Initial VAMC or DSP's Catchment Area

If a family wants to move to another jurisdiction where it will not be possible for the initial PHA's partnering VAMC or DSP to provide case management services, the initial VAMC or DSP must first determine that the VASH family could be served by another VAMC or DSP that is participating in the VASH program, and the receiving PHA has an available VASH voucher.

In these cases, the family must be absorbed by the receiving PHA either as a new admission or as a portability move-in, as applicable. Upon absorption, the initial PHA's VASH voucher will be available to lease to a new VASH-eligible family, and the absorbed family will count toward the number of VASH slots awarded to the receiving PHA.

Portability Outside of the Initial VAMC or DSP's Catchment Area under VAWA

Veterans who, under VAWA, request to port beyond the catchment area of the VAMC or DSP where they are receiving case management, may port prior to receiving approval from the receiving VAMC or DSP. The initial PHA must follow its emergency transfer plan (see Exhibit 16-3). PHAs may require verbal self-certification or a written request from a participant seeking a move beyond the catchment area of the VAMC or DSP.

The verbal self-certification or written request must include either a statement expressing why the participant reasonably believes that there is a threat of imminent harm from further violence if they were to remain in the same unit or a statement that the tenant was a sexual assault victim and the sexual assault occurred on the premises during the 90-day period preceding the participants request for the move.

The participant must still port to a PHA that has a VASH program. If the receiving PHA does not have a VASH voucher available to lease, they may bill the initial PHA until a VASH voucher is available, at which point the porting veteran must be absorbed into the receiving PHAs program.

19-IV.H. TERMINATION OF ASSISTANCE [FR Notice 9/27/21]

Except for terminations for failure to receive case management, HUD has not established any alternative requirements for termination of assistance for VASH participants. However, prior to terminating VASH participants, HUD strongly encourages PHAs to exercise their discretion under 24 CFR 982.552(c)(2) as outlined in Section 12-II.D. of this policy and consider all relevant circumstances of the specific case. This includes granting reasonable accommodations for persons with disabilities, as well as considering the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination.

VASH participant families may not be terminated after admission for a circumstance or activities that occurred prior to admission and were known to the PHA but could not be considered at the time of admission due to VASH program requirements. The PHA may terminate the family's assistance only for program violations that occur after the family's admission to the program.

Cessation of Case Management

As a condition of receiving HCV rental assistance, a HUD-VASH-eligible family must receive case management services from the VAMC or DSP. A VASH participant family's assistance must be terminated for failure to participate, without good cause, in case management as verified by the VAMC or DSP.

However, a VAMC or DSP determination that the participant family no longer requires case management is not grounds for termination of voucher or PBV assistance. In such a case, at its option, the PHA may offer the family continued assistance through one of its regular vouchers. If the PHA has no voucher to offer, the family will retain its VASH voucher or PBV unit until such time as the PHA has an available voucher for the family.

VAWA [FR Notice 9/27/21]

When a veteran's family member is receiving protection under VAWA because the veteran is the perpetrator of domestic violence, dating violence, sexual assault, or stalking, the victim must continue to be assisted. Upon termination of the perpetrator's VASH assistance, the victim must be given a regular HCV if one is available, and the perpetrator's VASH voucher must be used to serve another eligible veteran family. If a regular HCV is not available, the perpetrator must be terminated from assistance and the victim will continue to use the VASH voucher.

19-IV.I. PROJECT-BASING VASH VOUCHERS

General Requirements [Notice PIH 2017-21 and FR Notice 9/27/21]

PHAs are authorized to project-base their tenant-based VASH vouchers without additional HUD review or approval in accordance with Notice PIH 2017-21 and all PBV program requirements provided that the VAMC will continue to make supportive services available.

In addition, since 2010, HUD has awarded VASH vouchers specifically for project-based assistance in the form of PBV HUD-VASH set-aside vouchers. While these vouchers are excluded from the PBV program cap as long as they remain under PBV HAP contract at the designated project, all other VASH vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A. Note that VASH supportive services only need to be provided to VASH families

receiving PBV assistance in the project, not all families receiving PBV assistance in the project. If a VASH family does not require or no longer requires case management, the unit continues to count as an excepted PBV unit as long as the family resided in the unit.

HACSD Policy

HACSD may apply for specific HUD funding for project-based HUD-VASH vouchers or set aside existing HUD-VASH vouchers in accordance with PBV program regulations.

If the PHA project-bases VASH vouchers, the PHA must consult with the partnering VAMC or DSP to ensure approval of the project or projects. PHAs may project-base VASH vouchers in projects alongside other PBV units and may execute a single HAP contract covering both the VASH PBVs and the other PBVs. The PHA must refer only VASH families to PBV units exclusively made available to VASH families and to PBV units funded through a HUD set-aside award.

If a VASH family is referred to the PHA and there is an available PBV unit that is not exclusively made available to VASH families, the PHA may offer to refer the family to the owner if allowable under the selection policy for that project, and the owner and PHA may amend the HAP contract to designate the PBV unit as a VASH PBV unit.

The PHA and owner may agree to amend a PBV HAP contract to redesignate a regular PBV unit as a unit specifically designated for VASH families so long as the PHA first consults with the VAMC or DSP. Additionally, the PHA and owner may agree to amend a PBV HAP contract to redesignate specifically designated for VASH families as a regular PBV unit, so long as the unit is not funded through a VASH PBV set-aside award and is eligible for regular PBV (i.e., the unit is not on the grounds of a medical facility and the unit is eligible under the PHA's program and project caps).

Policies for VASH PBV units will generally follow PHA policies for the standard PBV program as listed in Chapter 17, except for the policies listed below.

Failure to Participate in Case Management [FR Notice 9/27/21]

Upon notification by the VAMC or DSP of the family's failure to participate in case management without good cause, the PHA must provide the family a reasonable time period to vacate the unit. The PHA must terminate assistance to the family at the earlier of either the time the family vacates, or the expiration of the reasonable time period given to vacate.

HACSD Policy

Upon notification by the VAMC or DSP that a VASH PBV family has failed to participate in case management without good cause, HACSD will provide written notice of termination of assistance to the family and the owner within 10 business days. The family will be given 60 days from the date of the notice to move out of the unit.

HACSD may make exceptions to this 60-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the PHA must remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The PHA may add the removed unit to the HAP contract after the ineligible family vacates the property.

Moves [HUD-VASH Qs and As, FR Notice 9/27/21]

When a VASH PBV family is eligible to move from its PBV unit in accordance with Section 17-VIII.C. of this policy, but there is no other comparable tenant-based rental assistance, the following procedures must be implemented:

- If a VASH tenant-based voucher is not available at the time the family wants (and is eligible) to move, the PHA may require a family who still requires case management to wait for a VASH tenant-based voucher for a period not to exceed 180 days.
- If a VASH tenant-based voucher is still not available after that period, the family must be allowed to move with its VASH voucher. Alternatively, the PHA may allow the family to move with its VASH voucher without having to meet this 180-day period. In either case, the PHA is required to replace the assistance in the PBV unit with one of its regular vouchers, unless the PHA and owner agree to temporarily remove the unit from the HAP contract; and
- If a VASH veteran is determined to no longer require case management and a VASH voucher is not immediately available, the PHA must allow the family to move with the first available tenant-based voucher and cannot require the family to wait for a VASH voucher to become available.

PART V: FAMILY UNIFICATION PROGRAM (FUP)

19-V.A. PROGRAM OVERVIEW [Fact Sheet, Housing Choice Voucher Program Family Unification Program (FUP)]

Overview

The Family Unification Program (FUP) was authorized by Congress in 1990 to help preserve and reunify families. PHAs that administer the program provide vouchers to two different populations—FUP families and FUP youth.

Families eligible for FUP are families for whom the lack of adequate housing is a primary factor in:

- The imminent placement of the family's child or children in out-of-home care; or
- The delay in the discharge of the child or children to the family from out-of-home care.

There is no time limitation on FUP family vouchers, and the family retains their voucher as long as they are HCV-eligible. There is no requirement for the provision of supportive services for FUP family vouchers.

Youth eligible for FUP are those who:

- Are at least 18 years old and not more than 24 years of age;
- Have left foster care or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 and older; and
- Are homeless or at risk of becoming homeless.

FUP youth vouchers are limited by statute to a period between 36 and 60 months of housing assistance. Supportive services must also be provided to FUP-eligible youth by the Public Child Welfare Agency (PCWA) or by another agency or organization under contract with the PCWA for the period of time defined in the Notice of funding Availability/Opportunity (NOFA/O) for which funding was made available.

PHAs that wish to administer FUP vouchers must apply to HUD by submitting an application under an active Notice of Funding Opportunity (NOFO). While the FUP program is administered in accordance with HCV regulations, the FUP NOFOs issued by HUD provide specific program information and requirements.

In order to administer the program, the PHA must also form a partnership with a local PCWA who is responsible for determining the family or youth meets FUP eligibility requirements and referring them to the PHA. Once the referral is received, the PHA is responsible for placing the FUP family or youth on the PHA's waiting list and determining whether they are eligible to receive assistance under the PHA's HCV program.

Assigning Vouchers [FUP FAQs]

The PHA may, but is not required to, assign a specific number or percentage of FUP vouchers for FUP youths and FUP families. Unless the PHA assigns a specific number or percentage of FUP vouchers to a designated FUP population, the PHA must serve any referrals (youths or families) that meet all program eligibility requirements up to the PHA's designated FUP program size.

HACSD Policy

HACSD has not designated any specific number or percentage of FUP vouchers for youths or families. HACSD will serve all referrals that meet program eligibility requirements, up to the PHA's FUP voucher allocation. HACSD administers 37 FUP vouchers which will be prioritized and allocated between the two programs, as determined by the PCWA.

19-V.B. PUBLIC CHILD WELFARE AGENCY (PCWA)

Families and youth do not apply directly to the PHA for FUP vouchers. They are instead referred by a PCWA with whom the PHA has entered into a Memorandum of Understanding (MOU). The partnering PCWA initially determines whether the family or youth meets the FUP program eligibility requirements listed in 19-V.C. and 19-V.D. and then refers those families or youths to the PHA.

HUD strongly encourages PHAs and PCWAs to make decisions collaboratively on the administration of the program and to maintain open and continuous communication. The PCWA must have a system for identifying FUP-eligible youth within the agency's caseload and for reviewing referrals from a Continuum of Care (COC) if applicable.

HACSD Policy

HACSD has entered into an MOA with the following partnering organizations:

County of San Diego HHSA's Child Welfare Services (CWS)

Regional Task Force on Homelessness (RTFH)

Supportive Services

The PCWA must provide supportive services for the period of time defined in the notice or NOFA/O for which the funding was made available to all FUP-eligible youth regardless of their age. The MOU between the PHA and the PCWA should identify the period of time in which supportive services will be provided.

HACSD Policy

CWS will provide or secure supportive services for all FUP youth for a period of 36 months.

Supportive services may be provided to FUP-eligible youth by the PCWA or by another agency or organization under agreement or contract with the PCWA, including the PHA. The organization providing the services and resources must be identified in the MOU. The following services must be offered:

- Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation; and access to health care (e.g., doctors, medication, and mental and behavioral health services);
- Counseling on compliance with rental lease requirements and with HCV program participant requirements, including assistance or referrals for assistance on security deposits, utility hook-up fees, and utility deposits;
- Providing such assurances to owners of rental property as are reasonable and necessary to

assist an FUP-eligible youth to rent a unit with an FUP voucher;

- Job preparation and attainment counseling (where to look/how to apply, dress, grooming, relationships with supervisory personnel, etc.); and
- Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); or attendance or financing of education at a technical school, trade school, or college, including successful work ethic and attitude models.

HACSD Policy

Additional supportive services will not be offered.

A FUP-eligible youth cannot be required to participate in these services as a condition of receipt of the FUP voucher.

19-V.C. FUP FAMILY VOUCHER ELIGIBILITY CRITERIA

FUP family assistance is reserved for eligible families that the PCWA has certified are a family for whom a lack of adequate housing is a primary factor in:

- The imminent placement of the family's child or children in out-of-home care, or
- The delay in the discharge of the family's child or children to the family from out-of-home care.

Lack of adequate housing means the family meets any one of the following conditions:

- Living in substandard housing, which refers to a unit that meets any one of the following conditions:
 - Does not have operable indoor plumbing
 - Does not have a usable flush toilet inside the unit for the exclusive use of a family or youth
 - Does not have a usable bathtub or shower inside the unit for the exclusive use of a family or youth
 - Does not have electricity, or has inadequate or unsafe electrical service
 - Does not have a safe or adequate source of heat
 - Should, but does not, have a kitchen
 - Has been declared unfit for habitation by an agency or unit of government, or in its present condition otherwise endangers the health, safety, or well-being of the family or youth
 - Has one or more critical defects, or a combination of intermediate defects in sufficient number or to the extent that it requires considerable repair or rebuilding. The defects may result from original construction, from continued neglect or lack of repair, or from serious damage to the structure
- Being homeless as defined in 24 CFR 578.3
- Living in a unit where the presence of a household member with certain characteristics (i.e., conviction for certain criminal activities) would result in the imminent placement of the family's

19-V-F. REFERRALS AND WAITING LIST MANAGEMENT

Referrals

The PCWA must establish and implement a system to identify FUP-eligible families and youths within the agency's caseload and make referrals to the PHA. The PCWA must certify that the FUP applicants they refer to the PHA meet FUP eligibility requirements. The PHA is not required to maintain full documentation that demonstrates the family's or youth's FUP eligibility as determined by the PCWA but should keep the referral or certification from the PCWA.

HACSD Policy

As part of the MOA, HACSD and CWS have identified staff positions to serve as lead FUP liaisons. These positions will be responsible for transmission and acceptance of FUP referrals. CWS must commit sufficient staff and resources to ensure eligible families and youths are identified and determined eligible in a timely manner.

When FUP vouchers are available, the HACSD liaison responsible for acceptance of referrals will contact the CWS FUP liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. CWS liaison will provide the PHA with a list of eligible referrals include the name, address, and contact phone number for each adult individual who is being referred; a completed release form for each adult family member; and a written certification for each referral indicating the youth or family is FUP-eligible.

HACSD will maintain a copy of the referral or certification from CWS in the participant's file along with other eligibility paperwork.

A PHA must serve any referrals (youths or families) that meet all program eligibility requirements. If a PHA determines that it has received a sufficient number of referrals from the PCWA so that the PHA will be able to lease all FUP vouchers awarded, the PHA may request that the PCWA suspend transmission of referrals. If the PHA determines that additional referrals will be needed after it has made such a request, the PHA may request that the PCWA resume transmission of referrals [Notice PIH 2011-52]

Waiting List Placement

A family that is already participating in the regular HCV program cannot be transferred to an FUP voucher.

Once a referral is made, the PHA must compare the list of PCWA referrals to its HCV waiting list to determine if any applicants on the PCWA's referral list are already on the PHA's HCV waiting list. Applicants already on the PHA's HCV waiting list retain the order of their position on the list. Applicants not already on the PHA's HCV waiting list must be placed on the HCV waiting list.

If the PHA's HCV waiting list is closed, the PHA must open its HCV waiting list in order to accept new FUP applicants. If necessary, the PHA may open its waiting list solely for FUP applicants, but this information must be included in the PHA's notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).

HACSD Policy

When a referral is received from CWS, HACSD will review the HCV waiting list and will send CWS a list confirming whether or not referrals are on the waiting list.

Referrals who are already on the list will retain their position and the list will be notated to indicate the family or youth is FUP-eligible.

For those referrals not already on the waiting list, HACSD will work with CWS to ensure they receive and successfully complete a pre-application or application, as applicable. Once the pre-application or application has been completed, HACSD will place the referral on the HCV waiting list with the date and time of the original referral and an indication that the referral is FUP-eligible.

Waiting List Selection

The PHA selects FUP-eligible families or youths based on the PHA's regular HCV waiting list selection policies in Chapter 4, including any preferences that may apply.

19-V.G. PHA HCV ELIGIBILITY DETERMINATION

Once a FUP-eligible family or youth is selected from the HCV waiting list, the PHA must determine whether the family or youth meets HCV program eligibility requirements. Applicants must be eligible under both FUP family or youth eligibility requirements, as applicable, and HCV eligibility requirements as outlined in Chapter 3 of this policy.

The PCWA may, but is not obligated to, provide information to the PHA on the family's criminal history.

HACSD Policy

HACSD will pull a criminal history for all adults at the time of initial eligibility.

HACSD will consider the information in making its eligibility determination in accordance with the PHA's policies in Chapter 3, Part III.

Additional FUP Eligibility Factors [FUP FAQs]

For FUP family vouchers, the family must remain FUP-eligible through lease-up.

- If, after a family is referred by the PCWA but prior to issuing a family FUP voucher, the PHA discovers that the lack of adequate housing is no longer a primary factor for the family not reunifying, the FUP voucher may not be issued to the family.
- Similarly, if the FUP voucher has already been issued before the PHA discovers that the reunification will not happen, but the family has not yet leased up under the voucher, the PHA must not execute the HAP contract, as the family is no longer FUP-eligible.

FUP-eligible youth must be no more than 24 years old both at the time of PCWA certification and at the time of the HAP execution. If a FUP youth is 24 at the time of PCWA certification but will turn 25 before the HAP contract is executed, the youth is no longer eligible for a FUP youth voucher.

HACSD Policy

Any applicant that does not meet the eligibility criteria for the HCV program listed in Chapter 3 or any eligibility criteria listed in this section will be notified by the PHA in writing following policies in Section 3-III.F., including stating the reasons the applicant was found ineligible and providing an opportunity for an informal review.

19-V.H. LEASE UP [FR Notice 1/24/22]

Once the PHA determines that the family or youth meets HCV eligibility requirements, the family or youth will be issued a FUP voucher in accordance with PHA policies.

During the family briefing, PHAs must inform the FUP youth of:

- The extension of assistance provisions and requirements;
- The availability of the FSS program and offer them an FSS slot, if available, or offer to place them on the FSS waiting list; and
- Supportive services available to them, the existence of any other programs or services, and their eligibility for such programs and services. However, participation in supportive services cannot be required as a condition of receiving FUP youth assistance.

HACSD Policy

Eligible applicants will be notified by the PHA in writing following policies in Section 3-III.F. of this administrative plan. FUP families will attend a standard HCV briefing in accordance with PHA policies in Part I of Chapter 5 of this administrative plan. FUP youth will be briefed individually. The PHA will provide all aspects of the written and oral briefing as outlined in Part I of Chapter 5 but will also provide an explanation of the required items listed above, as well as discussing supportive services offered by the PCWA.

For both FUP youth and FUP families, vouchers will be issued in accordance with PHA policies in Chapter 5 Part II.

Upon CWS verification of minor children who will be returned to the FUP household, the bedroom size voucher to be issued to the household will be based on the number of family members that include the minor children being returned.

Once the family or youth locate a unit, the PHA conducts all other processes relating to voucher issuance and administration per HCV program regulations and the PHA's policies (including, but not limited to: HQS inspection, determination of rent reasonableness, etc.).

19-V.I. TERMINATION OF ASSISTANCE

General Requirements

Except for terminations of assistance for FUP youth after the statutorily required time period, terminations of FUP assistance are handled in the same way as the regular HCV program. Termination of a FUP voucher must be consistent with regulations for termination in 24 CFR Part 982, Subpart L and be in compliance with PHA policies (Chapter 12).

If the person who qualifies for the FUP voucher passes away, the family retains the FUP voucher. In the case of a FUP-youth voucher, assistance will terminate after the statutorily required time period, even if the FUP-eligible youth is no longer included in the household.

If the person who qualifies for the FUP voucher moves, the remaining family members may keep the FUP voucher based on PHA policy (see administrative plan, Section 3-I.C., Family Breakup and Remaining Member of Tenant Family).

FUP Family Vouchers

If parents lose their parental rights or are separated from their children after voucher lease-up (or their children reach adulthood), the family is still eligible to keep their FUP assistance, as the regulations do not permit HCV termination for a family losing parental rights or the children reaching adulthood. However, the PHA may transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household.

HACSD Policy

HACSD will transfer the assistance of a FUP family voucher holder to regular HCV assistance if there are no longer children in the household and there is no prospect of any minor child being returned to the household.

If HACSD has no regular HCV vouchers available at the time this determination is made, including if no vouchers are available due to lack of funding, the PHA will issue the family the next available regular HCV voucher after those being issued to families residing in PBV units claiming Choice Mobility.

FUP Youth Vouchers

A PHA cannot terminate a FUP youth's assistance for noncompliance with PCWA case management, nor may the PHA terminate assistance for an FUP youth for not accepting services from the PCWA.

The PHA may not transfer the assistance of a FUP youth voucher holder to regular HCV assistance upon the expiration of the statutorily required time period. However, the PHA may issue a regular HCV to FUP youth if they were selected from the waiting list in accordance with PHA policies and may also adopt a preference for FUP youth voucher holders who are being terminated for this reason.

HACSD Policy

HACSD will not provide a selection preference on the PHA's HCV waiting list for FUP youth who are terminated due to the time limit on assistance.

Upon the expiration of the statutorily required time period, a FUP youth voucher holder who has children and who lacks adequate housing may qualify for a FUP family voucher provided they are referred by the PCWA as an eligible family and meet the eligibility requirements for the PHA's HCV program.

19-V.J. FUP PORTABILITY

Portability for a FUP family or youth is handled in the same way as for a regular HCV family. A PHA may not restrict or deny portability for a FUP family or youth for reasons other than those specified in the HCV program regulations, as reflected in Chapter 10 of the administrative plan.

A FUP family or youth does not have to port to a jurisdiction that administers FUP.

If the receiving PHA administers the FUP voucher on behalf of the initial PHA, the voucher is still considered a FUP voucher regardless of whether the receiving PHA has a FUP program.

If the receiving PHA absorbs the voucher, the receiving PHA may absorb the incoming port into its FUP program (if it has one) or into its regular HCV program (if the receiving PHA has vouchers available to do so) and the family or youth become regular HCV participants. In either case, when the receiving PHA absorbs the voucher, a FUP voucher becomes available to the initial PHA.

Considerations for FUP Youth Vouchers

If the voucher is a FUP youth voucher and remains such upon lease-up in the receiving PHA's jurisdiction, termination of assistance must still take place once the youth has received assistance for the statutorily required time period. Any time period during which no subsidy was paid on behalf of the youth does not count under the time limit. If the receiving PHA is administering the FUP youth voucher on behalf of the initial PHA, the two PHAs must work together to initiate termination upon expiration of the statutorily required time period.

19-V.K. PROJECT-BASING FUP VOUCHERS [Notice PIH 2017-21; FR Notice 1/24/22]

The PHA may project-base FUP vouchers without HUD approval in accordance with Notice PIH 2017-21, FR Notice 1/24/22, and all statutory and regulatory requirements for the PBV program. Project-based FUP vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A.

The PHA may limit PBVs to one category of FUP-eligible participants (families or youth) or a combination of the two.

While FUP vouchers can be used for either families or youth, a PBV unit may only be counted towards the PHA's 10 percent exception authority under the program cap and the project's income-mixing requirement if the FUP PBV assistance is provided on behalf of an eligible youth. The PHA must amend its administrative plan to include the limitation of these FUP PBV units to eligible youth.

HACSD Policy

HACSD will not project-base FUP vouchers. All FUP vouchers will be used to provide tenant-based assistance.

PART VI: EMERGENCY HOUSING VOUCHER (EHV) PROGRAM

19-VI.A. PROGRAM OVERVIEW [NOTICE PIH 2021-15]

Emergency housing vouchers (EHVs) assist individuals and families who are experiencing homelessness; at risk of experiencing homelessness, fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

EHVs are a tenant-based rental assistance under section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)) and funded under the American Rescue Plan Act of 2021. EHVs are operated separately from the Housing Choice Voucher (HCV) program in accordance with Notice PIH 2021-15. HACSD administers 264 EHVs in coordination with the Regional Task Force on Homelessness (RTFH).

In accordance with the MOA between HACSD and RTFH, applicants are referred through the Coordinated Entry System (CES) and have access to a menu of services intended to facilitate and expedite leasing.

The PHA may not project-base EHVs as EHVs are tenant-based assistance with requirements that are inconsistent with the Project-Based Voucher program.

Funding Overview

The American Rescue Plan Act of 2021 (ARP) provides administrative fees and funding for the costs of administering emergency housing vouchers (EHVs) and other eligible expenses defined in Notice PIH 2021-15. These fees may only be used for EHV administration and other eligible expenses and must not be used for or applied to other PHA programs or vouchers. The PHA must maintain separate financial records from its regular HCV funding for all EHV funding.

Funds for EHVs may be recaptured and reallocated if the PHA does not lease its authorized EHVs within a reasonable period of time.

Housing Assistance Payments (HAP) Funding

ARP funding obligated to the PHA as housing assistance payments (HAP) funding may only be used for eligible EHV HAP expenses (i.e., rental assistance payments). EHV HAP funding may not be used for EHV administrative expenses or for the eligible uses under the EHV services fee.

The initial funding term expires December 31, 2022. HUD will provide renewal funding to the PHA for the EHVs on a calendar year (CY) basis commencing with CY 2023.

Administrative Fee and Funding

The following four types of fees and funding are allocated as part of the EHV program:

- **Preliminary fees** support immediate start-up costs that the PHA will incur in implementing alternative requirements under EHV, such as outreach and coordination with partnering agencies:

- \$400 per EHV allocated to the PHA, once the consolidated annual contributions (CACC) is amended.
- This fee may be used for any eligible administrative expenses related to EHV's.
- This fee may also be used to pay for any eligible activities under EHV service fees.
- **Placement fees/expedited issuance reporting fees** will support initial lease-up costs and the added cost and effort required to expedite leasing of EHV's:
 - \$100 for each EHV initially leased, if the PHA reports the voucher issuance date in Public Housing Information Center- Next Generation (PIC-NG) system within 14 days of voucher issuance or the date the system becomes available for reporting.
 - Placement fees:
 - \$500 for each EHV family place under a Hap contract effective within four months of the effective date of the aACC funding increment; or
 - \$250 for each EHV family placed under a HAP contract effective after four months but less than six months after the effective date of the ACCC funding increment.
 - HUD will determine placement fees in the event of multiple EHV allocations and funding increment effective dates.
 - Placement/expedited issuance fees only apply to the initial leasing of the voucher; they are not paid for family moves or to turnover vouchers.
- **Ongoing administrative fees**, which are calculated in the same way as the standard HCV program:
 - PHAs are allocated administrative fees using the full column A administrative fee amount for each EHV under contract as of the first day of each month.
 - Ongoing EHV administrative fees may be subject to proration in future years, based on available EHV funding.
- **Services fees**, which are a one-time fee to support PHAs' efforts to implement and operate an effective EHV services program in its jurisdiction:
 - The fee is allocated once the PHA's CACC is amended to reflect EHV funding.
 - The amount allocated is \$3,500 for each EHV allocated.

19-VI.B. SERVICES FEES

PHAs are allocated a one-time services fee to support efforts in implementing and operating an effective EHV services program that will best address the needs of EHV eligible individuals and

families. The amount allocated is equal to \$3,500 for each EHV allocation. This service fee is the combined total of the services fees for the menu of eligible use service to assist families to successfully lease units with the EHV's.

Services fee funding must be initially used for defined eligible uses and not for other administrative expenses of operating the EHV program. Services fees fall into four categories:

- Housing search assistance
- Security deposit/utility deposit/rental application/holding fee uses
- Owner-related uses
- Other eligible uses such as moving expenses or tenant-readiness services

The PHA must establish the eligible uses and the parameters and requirements for service fees in the PHA's administrative plan.

HACSD Policy

The eligible uses for service fees include:

Housing search assistance, which may include activities such as:

- Helping an individual or family identify and visit potentially available units during their housing search;
- Helping to find a unit that meets the household's disability related needs;
- Conducting owner outreach;
- Providing transportation and directions, assisting with the completion of rental applications and PHA forms;
- Helping to expedite the leasing process for the household; and
- Counseling on compliance with rental lease requirements.
- HACSD, RTFH and/or partnering service provider will assist eligible households by providing housing navigation services.

Application fees/Deposit Assistance

HACSD, RTFH and/or partnering service providers may also offer assistance from a menu of elective services, which may or may not be included under the Housing Navigation component:

- ***Application Assistance*** – Assist individuals with the completion of applications, forms, and collection of necessary documentation to support the eligibility and leasing process;
- ***Deposit Assistance**** – Assess households who may require assistance with security deposits, application fees or holding deposits, or utility deposits for initial service as follows:
 - Up to \$50 per application;
 - Up to ten days rent for holding deposit;
 - Up to two month's rent for security deposit assistance; and,

- Up to \$100 for utility deposit assistance.

**HACSD may assist with fees as funding permits*

- *Supportive Services* – Assess and refer households for supportive services and resources which may include voluntary case management, moving expenses, tenant readiness services, and essential household items supporting housing stability;
- *Owner Outreach* – Conduct owner recruitment and outreach as well as implement incentive and retention payments

Any services fee assistance that is returned to the PHA after its initial or subsequent use may only be applied to the eligible services fee uses defined in Notice PIH 2021-15 (or subsequent notice) or other EHV administrative costs. Any amounts not expended for these eligible uses when the PHA's EHV program ends must be remitted to HUD.

19-VI.C. PARTNERING AGENCIES[NOTICE PIH 2021-15, MOA]

Continuum of Care (CoC)

PHAs that accept an allocation of EHV's are required to enter into a Memorandum of Understanding (MOU) with the Continuum of Care (CoC) to establish a partnership for the administration of EHV's.

HACSD Policy

HACSD has entered into a Memorandum of Agreement (MOA) with the Regional Taskforce on Homelessness (RTFH).

Other Partnering Organizations

The PHA may, but is not required to, partner with other organizations trusted by persons experiencing homelessness, such as victim services providers (VSPs) and other community partners. If the PHA chooses to partner with such agencies, the PHA must either enter into an MOU with the partnering agency or the partnering agency may be added to the MOU between the PHA and CoC.

HACSD Policy

HACSD has not added additional partnering agencies to the MOA between the HACSD and RTFH.

Referrals

The primary responsibility of the CoC under the MOU with the PHA is to make direct referrals of qualifying individuals and families to the PHA. The PHA must generally refer a family that is seeking EHV assistance directly from the PHA to the CoC for initial intake, assessment, and possible referral for EHV assistance. Partner CoCs are responsible for determining whether the family qualifies under one of the four eligibility categories for EHV's. The CoC or other direct referral partner must provide supporting documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance.

HACSD must accept referrals in coordination with the RTFH servicing as the Coordination of Care (CoC). Services may be provided by the PHA and/or community service providers based on MOA/contract.

HACSD Policy

HACSD will implement the EHV program in partnership with the RTFH and connected providers.

Offers of Assistance with CoC Referral

The PHA may make an EHV available without a referral from the CoC or other partnering organization in order to facilitate an emergency transfer under VAWA in accordance with the PHA's Emergency Transfer Plan (ETP) in Chapter 16.

The PHA may take direct referrals from outside the CoC if:

- The CoC does not have a sufficient number of eligible families to refer to the PHA; or
- The CoC does not identify families that may be eligible for EHV assistance because they are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking.

If at any time the PHA is not receiving enough referrals or is not receiving referrals in a timely manner from the CoC or other partner referral agencies (or the PHA and CoC cannot identify any such alternative referral partner agencies), HUD may permit the PHA on a temporary or permanent basis to take EHV applications directly from applicants and admit eligible families to the EHV program in lieu of or in addition to direct referrals in those circumstances.

19-VI.D. WAITING LIST ADMINISTRATION

HCV Waiting List [Notice PIH 2021-15; EHV FAQ]

The regulation that requires the PHA to admit applicants as waiting list admissions or special admissions in accordance with admission policies in Chapter 4 does not apply to PHAs operating the EHV program. Direct referrals are not added to the PHA's HCV waiting list.

The PHA must inform families on the HCV waiting list of the availability of EHV by, at a minimum, either posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2021-15.

HACSD Policy

HACSD will post information about the EHV program for families on the PHA's HCV waiting list on its website. The notice will:

- Describe the eligible populations to which EHV are limited
- Clearly state that the availability of these EHV is managed through a direct referral process
- Advise the family to contact a Coordinated Entry Access Site if the family believes they may be eligible for EHV assistance

The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The PHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

EHV Waiting List

The HCV regulations requiring the PHA to operate a single waiting list for admission to the HCV program do not apply to PHAs operating the EHV program. Instead, when the number of applicants referred by the CoC or partnering agency exceeds the EHV's available, the PHA must maintain a separate waiting list for EHV referrals, both at initial leasing and for any turnover vouchers that may be issued prior to September 30, 2023.

The EHV waiting list is not subject to the PHA policies in Chapter 4 regarding opening and closing the HCV waiting list. The PHA will work directly with its CoC and other referral agency partners to manage the number of referrals and the size of the EHV waiting list.

HACSD Policy

HACSD operates a separate waiting list for EHV's. Applicants referred through the CES are placed on and selected from the EHV waiting list based on the priorities established through the MOA and EHV Priorities Document.

Upon turnover, EHV's are awarded to eligible applicants referred through CES, but may not be reissued after September 30, 2023.

Admission Preferences [Notice PIH 2021-15]

If local preferences established for HCV admissions, they do not apply to EHV's. However, if the PHA has a homeless preference or a VAWA preference for the HCV waiting list, the PHA must adopt additional policies related to EHV's in accordance with Notice PIH 2021-15.

HACSD Policy

HACSD has a homeless preference for the HCV program. EHV application and referral procedures are available on the HACSD website.

The PHA may establish, in coordination with the CoC and other referral partners, separate local preferences or may choose not to establish any local preferences for the EHV waiting list.

HACSD Policy

Distribution of referrals will be determined by the CES, according to geographical service needs, and local order of prioritization within program operating requirements.

HACSD will not establish local preferences for EHV but will give additional consideration for:

1. households that include older adults, as defined by age 55 and up, or
2. households eligible for Behavioral Health Services.

These additional considerations apply to each priority level listed on the EHV priorities table.

Referral Priorities [RTFH MOA, Priorities Document]

The RTFH will make eligible referrals in the following order:

Priority Level	Eligible Households	CES Target Groups
A1*	Homeless	Households in interim housing; and -Enrolled in programs that offer navigation, case management, and/or post-lease up retention services
A2*	Recently homeless and for whom providing rental assistance will prevent the household's homelessness or having high risk of housing instability	-Households enrolled in time-limited subsidy programs who need a permanent housing resource in order to achieve or maintain housing stability; and/or - Households that are survivors of domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined under Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act), the Violence Against Women Act (VAWA) and Trafficking Victims Protection Act (TVPA)
A3*	Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking	-Unhoused or housed households who are fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking that do not meet Group 1 or 2.
B*	Homeless OR Recently homeless and for whom providing rental assistance will prevent the household's homelessness or having high risk of housing instability.	-Recently homeless and homeless households not identified in Priority Level A-Group 1 or 2
C*	At risk of homelessness	Households receiving prevention services that are targeted towards households that have a history of homelessness and are at very high risk of homelessness.

19-VI.E. FAMILY ELIGIBILITY [NOTICE PIH 2021-15]

The CoC determines whether the individual or family meets any one of the four eligibility criteria described in Notice PIH 2021-15 and then refers the family to the PHA. The PHA determines that the family meets other eligibility criteria for the HCV program, as modified for the EHV program and outlined below. HACSD may apply waivers and alternative requirements, in accordance with Notice PIH 2021-15, separate from the HCV program.

Unless expressly waived below, all statutory and regulatory requirements and HUD directives regarding the HCV program are applicable to EHV, including the use of all HUD-required contracts and forms. This includes the HACSD adopted CARES Act waivers according to the periods of availability and as authorized for EHV use.

Referring Agency Determination of Eligibility

To be eligible for an EHV, an individual or family must meet one of four eligibility criteria:

- Homeless as defined in 24 CFR 578.3;
- At risk of homelessness as defined in 24 CFR 578.3;
- Fleeing, or attempting to flee, domestic violence, sexual assault, stalking (as defined in Notice PIH 2021-15), or human trafficking (as defined in the 22 U.S.C. Section 7102); or
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability as determined by the CoC or its designee in accordance with the definition in Notice PIH 2021-15.

As applicable, the CoC or referring agency must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance. The PHA must retain this documentation as part of the family's file.

PHA Screening

HUD waived 24 CFR 982.552 and 982.553 in part for EHV applicants and established alternative requirements for mandatory and permissive prohibitions of admissions. Except where applicable, PHA policies regarding denials in Chapter 3 of this policy do not apply to screening individuals and families for eligibility for an EHV. Instead the EHV alternative requirement listed in this section will apply to all EHV applicants.

The mandatory and permissive prohibitions listed in Notice PIH 2021-15 and in this chapter, however, apply only when screening the individual or family for eligibility for an EHV. When adding a family member after the family has been placed under a HAP contract with EHV assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, the PHA must approve additional family members and may apply its regular HCV screening criteria in Chapter 3 to doing so.

Mandatory Denials

Under alternative requirements for the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(ii)(C), which prohibits admission if any household member has

ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.

- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

The PHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

Permissive Denials

Notice PIH 2021-15 lists permissive prohibitions for which the PHA may, but is not required to, deny admission to EHV families. The notice also lists prohibitions which may not be used to deny assistance to EHV families.

HACSD Policy

HACSD will only apply mandatory prohibitions.

Income Verification at Admission

Self-Certification at Admission

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to EHV program applicants at admission, and PHAs may consider self-certification the highest form of income verification at admission. Applicants must submit an affidavit attesting to their reported income, assets, expenses, and other factors that would affect an income eligibility determination.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dates within 60 days of the PHA's request.

HACSD Policy

Self-Certification/Self-Declaration may be used together with any other available sources to verify income. HACSD will allow ten days for the return of available verification of income before allowing self-certification. Any documents used for verification must be the original and dated within the 60-day period prior to admission.

Any family self-certifications must be made in a format acceptable to the HACSD and must be signed by the family member whose information or status is being verified.

Recently Conducted Income Determinations

PHAs may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:

- The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and

- The family certifies there has been no change in income or family composition in the interim.

HACSD Policy

HACSD will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.

The family certification must be made in a format acceptable to HACSD and must be signed by all adult family members whose information or status is being verified.

At the time of the family's annual reexamination the PHA must conduct the annual reexamination of income as outlined at 24 CFR 982.516 and policies in Chapter 11.

EIV Income Validation

Once HUD make the EIV data available to PHAs under this waiver and alternative requirement, the PHA must:

- Review the EIV Income and Income Validation Tool (IVT) reports to confirm and validate family-reported income within 90 days of the PIC submission date:
- Print and maintain copies of the EIV Income and IVT Reports in the tenant file: and
- Resolve any income discrepancy with the family within 60 days of the EIV Income and IVT Report dates.

Prior to admission, PHAs must continue to use HUD's EIV system to search for all household members using the Existing Tenant Search in accordance with PHA policies in Chapter 3.

If a PHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program in accordance with Chapter 12.

Social Security Number and Citizenship Status Verification

For the EHV program, the PHA is not required to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the EHV program. Instead, PHAs may adopt policies to admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless the PHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If the PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

HACSD Policy

HACSD will admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with the policies in Chapter 7 within 180 days of admission. HACSD may provide an additional 60-day extension

based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If HACSD determines that an ineligible family received assistance, HACSD will take steps to terminate that family from the program in accordance with policies in Chapter 12.

Age and Disability Verification

PHAs may accept self-certification of date and birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

HACSD Policy

HACSD will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to HACSD and must be signed by the family member whose information or status is being verified. If a self-certification is accepted, within 90 days of admission, HACSD will verify the information in EIV or through other third-party verification if the information is not available in EIV. HACSD will note in the family's file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant's date of birth and/or disability status.

Income Targeting

The PHA must determine income eligibility for EHV families in accordance with 24 CFR 982.201 and PHA policy in Chapter 3; however, income targeting requirements do not apply for EHV families. Households must still be below 50% AMI. The PHA may still choose to include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

HACSD Policy

HACSD may include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

19-VI.F. HOUSING SEARCH AND LEASING

Once the PHA determines that the individual or family meets EHV eligibility requirements, the individual or family will be issued an EHV voucher in accordance with PHA policies.

Initial Voucher Term

Unlike the standard HCV program, which requires an initial voucher term of at least 60 days, EHV vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Chapter 5-II.E. will apply.

Housing Search Assistance

The PHA must ensure housing search assistance is made available to EHV families during their initial housing search. The housing search assistance may be provided directly by the PHA or through the CoC or another partnering agency or entity.

At minimum, housing search assistance must:

- Help individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods;
- Provide transportation assistance and directions to potential units;
- Conduct owner outreach;
- Assist with the completion of rental applications and PHA forms; and
- Help expedite the EHV leasing process for the family.

HACSD Policy

As identified in the MOU between HACSD and RFTH, search assistance will be provided to each EHV family.

Eligible applicants will be notified by HACSD in writing following policies in Section 3-III.F. of this Plan. HACSD will provide all aspects of the written and oral briefing as outlined in Part I of Chapter 5 but will also discuss services as available by HACSD and partnering agencies.

Vouchers will be issued in accordance with HACSD policies in Chapter 5, Part II, except that the initial voucher term will be 120 days.

Once the individual or family locates a unit, the PHA conducts all other processes relating to voucher issuance and administration per EHV and HCV program regulation and the policies in Chapter 9.

HQS Pre-inspections

To expedite the leasing process, PHAs may pre-inspect available units that EHV families may be interested in leasing in order to maintain a pool of eligible units.

HACSD Policy

If an EHV family selects a unit that passed an HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved if it meets all other conditions under 24 CFR 982.305.

The family will be free to select their own unit.

Initial Lease Term

Unlike the standard HCV program, EHV voucher holders may enter into an initial lease that is for less than 12 months, regardless of the PHA policy in Section 9-I.E., Term of Assisted Tenancy.

After September 30, 2023, a PHA may not reissue any previously leased EHV, regardless of when the assistance for the formerly assisted family ends or ended. If an EHV is issued prior to September 30, 2023, and subsequently expires without being leased, the EHV may not be issued to another family.

19-VI.G. PORTABILITY

The normal HCV portability procedures and requirements outlined in Chapter 10 generally apply to EHVs. Exceptions are addressed below.

Nonresident Applicants

Under EHV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied, regardless of PHA policy in Section 10-II.B.

Billing and Absorption

A receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether the PHA does or does not currently administer EHVs under its own ACC.

- If the EHV family moves under portability to another PHA that administers EHVs under its own ACC:
 - The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do).
 - If the PHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.
 - Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving PHA's EHV policies, although neighboring PHAs and PHAs in the same metro area or region are strongly encouraged to work collaboratively with one another to align EHV policies and help facilitate EHV portability moves between their jurisdictions.
- If the EHV family moves under portability to another PHA that does not administer EHV under its own ACC, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

Family Briefing

In addition to the applicable family briefing requirements at CFR 982.301(a)(2) as to how portability works and how portability may affect the family's assistance, the initial PHA must inform the family how portability may impact the special EHV services and assistance that may be available to the family.

The initial PHA is required to help facilitate the family's portability move to the receiving PHA and inform the family of this requirement in writing taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).

HACSD Policy

In addition to the policy on briefings in Chapter 5, as part of the briefing packet for EHV families, HACSD will include a written notice that HACSD will assist the family with moves under portability.

For limited English proficient (LEP) applicants, HACSD will provide interpretation services in accordance with the LEP policies outlined in Chapter 2.

Coordination of Services

If the portability move is in connection with the EHV family's initial lease-up, the receiving PHA and the initial PHA must consult and coordinate on the EHV services and assistance that will be made available to the family.

HACSD Policy

For EHV families who are exercising portability, when HACSD contacts the receiving PHA in accordance with Section 10-II.B. *Pre-Approval Contact with Receiving PHA*, HACSD will consult and coordinate with the receiving PHA to ensure there is no duplication of EHV services and assistance, and ensure the receiving PHA is aware of the maximum amount of services fee funding that the initial PHA may provide to the receiving PHA on behalf of the family.

Services Fee

Standard portability billing arrangements apply for HAP and ongoing administrative fees for EHV families.

The requirements at CFR 982.355(e) apply to portability billing arrangements on behalf of an EHV family:

- The initial PHA must promptly reimburse the receiving PHA for the full amount of the housing assistance payments made by the receiving PHA for the family.
- The initial PHA must promptly reimburse the receiving PHA for the lesser of 80 percent of the initial PHA's EHV ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee (or the receiving PHA's EHV ongoing administrative fee if the receiving PHA administers the EHV program). If both PHAs agree, the PHAs may negotiate a different amount of reimbursement.
- For services fee funding, the amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the receiving PHA or \$1,750, unless the initial PHA and receiving PHA mutually agree to change the \$1,750 cap. Services fees are paid as follows: If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA. This is the case regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up.
- If the receiving PHA administers EHV's under its CACC, the receiving PHA may use its

own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance.

- If the receiving PHA does not administer EHV's under its CACC, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving the PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

When service fee arrangements are not known, the Housing Specialist must contact the other PHA to establish service fee arrangement and document election on the designated form.

HACSD Policy

HACSD will contact the other PHA to establish service fee arrangements on a case-by-case basis or as applicable to established cross-PHA agreements.

Placement Fee/Issuance Reporting Fee

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement/issuing reporting fee. The receiving PHA is eligible for the placement fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee, as applicable.

Note: The entire preliminary fee is always paid to and retained by the initial PHA and is not impacted by an EHV portability move.

19-VI.H PAYMENT STANDARDS

Payment Standard Schedule

For the EHV program, HUD has waived the regulation requiring a single payment standard for each unit size. Instead, the PHA may, but is not required to, establish separate higher payment standards for EHV's. Lower EHV payment standards are not permitted. If the PHA is increasing the regular HCV payment standard, the PHA must also increase the EHV payment standard if it would be otherwise lower than the new regular HCV payment standard. The separate EHV payment standard must comply with all other HCV requirements with the exception of the alternative requirements discussed below.

Further, if the PHA chooses to establish higher payment standards for EHV's, HUD has provided the following regulatory waiver defining the "basic range" for payment standards as between 90 and 120 percent of the published Fair Market Rent (FMR) for the unit size (rather than 90 to 110 percent).

HACSD Policy

HACSD has established a payment standard amount for EHV's at 120% of the SAFMR.

Rent Reasonableness

All rent reasonableness requirements apply to EHV units, regardless of whether the PHA has established an alternative or exception EHV payment standard.

Increases in Payment Standard

The requirement that the PHA apply increased payment standards at the family's first regular recertification on or after the effective date of the increase does not apply to EHV. The PHA may, but is not required to, establish an alternative policy on when to apply the increased payment standard, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change.

HACSD Policy

HACSD may apply increases in payment standards at interims.

19-VI.I TERMINATION OF VOUCHERS

After September 30, 2023, a PHA may not reissue EHV when assistance for an EHV-assisted family ends. This means that when an EHV participant (a family that is receiving rental assistance under a HAP contract) leaves the program for any reason, the PHA may not reissue that EHV to another family unless it does so no later than September 30, 2023.

If an applicant family that was issued the EHV is unsuccessful in finding a unit and the EHV expires after September 30, 2023, the EHV may not be reissued to another family.

All EHV under lease on or after October 1, 2023, may not under any circumstances be reissued to another family when the participant leaves the program for any reason.

An EHV that has never been issued to a family may be initially issued and leased after September 30, 2023, since this prohibition only applies to EHV that are being reissued upon turnover after assistance to a family has ended. However, HUD may direct PHAs administering EHV to cease leasing any unleased EHV if such action is determined necessary by HUD to ensure there will be sufficient funding available to continue to cover the HAP needs of currently assisted EHV families.

PART VII: HOME TBRA
[24 CFR 92]

19-VII.A. OVERVIEW

The HOME program awards grants to participating jurisdictions which can be used for rental assistance. Tenant-based rental assistance (TBRA) is a rental subsidy that can be used to assist individual households with rent and security deposits.

TBRA assistance moves with the tenant - if the household no longer wishes to rent a particular unit, the household may take its TBRA and move to another rental property within San Diego County.

The level of TBRA subsidy varies - the level of subsidy is based upon the income of the household, the particular unit the household selects, and the rent standard.

HOME Tenant-Based Rental Assistance (HOME TBRA) is funded under the Home Investment Partnership Act. These programs are designed to assist and support targeted populations.

19-VII.B. ADMINISTRATION

HACSD operates several HOME programs which provide term limited tenant-based rental assistance to designated vulnerable households., including:

- Former Foster Care Young Adults (FOSTER)
- Transitional Aged Youth (TAY)
- Family Reunification/Substance Abuse Treatment (SAT)
- Local Rent Subsidy (LRS)

Except as indicated, HOME TBRA is administered using the same eligibility criteria as the Housing Choice Voucher (HCV) program. Applicable HOME tenant-based rental assistance program regulations and requirements are found in 24 CFR 92.

The HACSD HOME TBRA program jurisdiction serves the San Diego County Unincorporated areas and the cities of Carlsbad, Coronado, Del Mar, Encinitas, Imperial Beach, La Mesa, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, and Vista.

HACSD does not maintain a waiting list. All applicants are referred as specified below.

The HOME Rental Assistance Contract, HOME Tenancy Addendum, and HOME Voucher are used with all HOME TBRA programs.

19-VII.C. REQUIREMENTS

Home Foster

HACSD partners with the County of San Diego, Health and Human Services Agency (HHSA), Child Welfare Services (CWS) and the Department of Homeless Solutions and Equitable Communities — Office of Homeless Solutions (HSEC-OHS) to assist participants with tenant-based rental assistance to young adults that transitioned or are transitioning from foster care.

HACSD Policy

HACSD has a Memorandum of Understanding (MOU) with the County of San Diego, Health and Human Services Agency (HHSA) to collaborate with eligible clients for housing assistance payments in accordance with 24 CFR 92.209, local HOME Tenant-Based policies and practices.

FOSTER is a transitional housing program, operated as a collaborative effort between the County of San Diego HHSA, Housing and Community Development Services (HCDS) and HACSD.

The program provides rental assistance, security deposit and utility assistance, as well as non-mandatory case management for up to 24 months to young adults admitted between the ages of 18 and 24 that were formerly in foster care. HOME funding supports the rental assistance component of the program.

Eligibility

Eligibility includes initial certification, annual recertification, and annual inspection of the units.

- Applicant is referred by HSEC-OHS.
- Applicant must have a source of income at or below 50% of the Area Median Income (AMI) for admission.
- Applicant is encouraged to maintain a full-time status of employment, training, or a combination of both.
 - Verification is reviewed by the Housing Specialist at initial eligibility, annual and interim reexamination, and whenever the household requests a transfer.
 - Work and/or school participation is monitored by HSEC-OHS.
- Term may not exceed 24 months from the date assistance begins. Youth may be admitted up to the age of 24 years old.
- Families are permitted to reside outside the HACSD HOME jurisdiction with a waiver. The waiver is completed by the HSEC-OHS.
- The family's rent share may not exceed 40% of the family's monthly-adjusted income.
- The 'minimum rent' is the total tenant payment of \$25 (rent and utilities).
- Annual HQS inspections are required.
- Annual recertification is required.

Subsidy Standards

Household Size	Voucher Size
1-2 persons	0 bedroom
3-5 persons	1 bedroom

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two

household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Payment Standard

The current Fair Market (FMR) is the payment standard.

Termination (Timing Out)

Households may not be assisted for more than 24 months. Reminder notices are mailed to the household at six months and 90 days prior to timing out. Termination notice is sent 30 days prior to termination.

HOME Investment Partnership Program TAY

HACSD partners with the County of San Diego, Health and Human Services Agency (HHSA) and the Department of Homeless Solutions and Equitable Communities — Office of Homeless Solutions (HSEC-OHS) to assist participants with tenant-based rental assistance to young adults 18 – 24 years of age.

HACSD Policy

HACSD has a Memorandum of Understanding (MOU) with the County of San Diego, Health and Human Services Agency (HHSA) to collaborate with eligible clients for housing assistance payments in accordance with 24 CFR 92.209, local HOME Tenant-Based policies and practices.

Transitional Aged Youth (TAY) is a transitional housing program, operated as a collaborative effort between the County of San Diego HHSA, Housing and Community Development Services (HCDS) and HACSD.

The program provides rental assistance, security deposit and utility deposit assistance, as well as non-mandatory case management for up to 24 months to young adults admitted between the ages of 18 and 24 that are experiencing homelessness or at risk of homelessness. HOME funding supports the rental assistance component of the program.

Eligibility

Eligibility includes initial certification, annual recertification, and annual inspection of the units.

- Applicant is referred by HSEC-OHS.
- Applicant must have a source of income at or below 50% of the Area Median Income (AMI) for admission.
- Applicant is encouraged to maintain a full-time status of employment, training, or a combination of both.
 - Verification is reviewed by the Housing Specialist at initial eligibility, annual and interim reexamination, and whenever the household requests a transfer.
 - Work and/or school participation is monitored by HSEC-OHS.
- Term may not exceed 24 months from the date assistance begins. Youth may be admitted up to the age of 24 years old.

- Families are permitted to reside outside the HACSD HOME jurisdiction with a waiver. The waiver is completed by the HSEC-OHS.
- Annual HQS inspections are required.
- Annual recertification is required.

Subsidy Standards

Household Size	Voucher Size
1-2 persons	1 bedroom
3-5 persons	2bedroom

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Payment Standard

The current Fair Market (FMR) is the payment standard.

Termination (Timing Out)

Households may not be assisted for more than 24 months. Reminder notices are mailed to the household at six months and 90 days prior to timing out. Termination notice is sent 30 days prior to termination.

Home SAT

HACSD partners with the County of San Diego, Health and Human Services Agency (HHSA), to assist participants of the County of San Diego's Substance Abuse Treatment (SAT) program. SAT is a tenant-based rental assistance program which provides rental, security deposit and utility assistance, and non-mandatory case management services and treatment supervision to families participating in the County's Substance Abuse Treatment program. Eligible participants must have an active Juvenile Dependency Court case and at least three months of documented sobriety. In addition, the lack of adequate housing must be documented to be a significant barrier to the return of the children to the family. The program is operated as a collaborative effort of HHSA, HACSD, and Housing and Community Development Services (HCDS). Case management and treatment supervision is provided as a program component.

HACSD Policy

HACSD has a Memorandum of Agreement (MOA) with the County of San Diego, Health and Human Services Agency (HHSA) to enter contracts with eligible clients for housing assistance payments in accordance with 24 CFR 92.209, local HOME Tenant-Based policies and practices.

Eligibility

Eligibility includes initial certification, annual recertification, and annual inspection of the units.

- Applicant is referred solely through a designated HHSA SAT case manager.
 - Intake is completed by the case manager

Housing Authority of the County of San Diego

- Applicant must have a source of income at or below 50% of the Area Median Income (AMI) for admission.
- Targeted population includes reunified families with children.
- Term may not exceed 18 months from the date assistance begins.
- Families are permitted to reside outside the HACSD HOME jurisdiction with a waiver. The waiver is completed by the CWS SAT Housing Coordinator.
- The family's rent share may not exceed 40% of the family's monthly-adjusted income.
- The 'minimum rent' is the total tenant payment of \$25 (rent and utilities)
- Annual HQS inspections are required.
- Annual recertification is required.

Subsidy Standards

Household Size	Voucher Size
1-2 persons	1 bedroom
3-5 persons	2 bedroom

Subsidy standards are as follows: one bedroom is assigned for the head of household and spouse/co-head and additional bedrooms are awarded for each additional two household members. All other guidelines outlined in this Plan regarding subsidy standards will apply.

Payment Standard

The current Fair Market (FMR) is the payment standard.

Termination (Timing Out)

Households may not be assisted for more than 18 months. Reminder notices are mailed to the household at six months and 90 days prior to timing out. Termination notice is sent 30 days prior to termination.

Local Rent Subsidy Program (LRSP)

The Local Rent Subsidy (LRS) program is a term limited program that provides up to two years of rental assistance to a limited number of persons transitioning out of County emergency shelter programs, including the Hotel/Motel Voucher program. This program is funded in part by HOME Investment Partnership program funds. LRSP will adhere to the Emergency Housing Voucher operating requirements and the Housing Choice Voucher (HCV) program unless otherwise indicated to comply with 24 CFR 92.209 or other direction of the County Board of Supervisors.

HACSD Policy

Eligibility

Eligible participants must be:

- Transitioning out of County emergency shelter programs, including the Hotel/Motel Voucher program, and;

- At the time of admission into the shelter program met the HUD definition of literally homeless, and;
- Were experiencing homelessness in the unincorporated areas of San Diego County.

LRSP will be administered as follows:

- *Income Limits:* Eligible LRSP participants' income must be at or below 50% Area Median Income (AMI).
- *Payment Standard:* The LRSP adheres to the following Fair Market Rent (FMR) standards.
- *Program Duration:* Participants may receive up to 24 months of rental assistance.
- *Criminal Prohibitions:* The LRSP applicants and their household members will have their criminal histories verified. Those subject to a lifetime registration requirement under a state sex offender registration program and/or those convicted of manufacturing or producing methamphetamines on the premises of federally assisted housing, are ineligible for the program.
- *Debt Owed to PHA:* If participant owes debt to the Public Housing Authority, they are eligible to participate in the LRSP as long as they make monthly payments toward that debt while receiving rental assistance from County HCDS.
- *Service Area:* LRSP participants may lease up in areas outside of the County of San Diego Public Housing Authority with an approved waiver.
- *Eligibility for HCV:* In determining eligibility to the HCV program, participants of the LRSP, will qualify for the tenant selection preference of homelessness and/or any other applicable preference to the same extent as when they were determined eligible for LRSP as outlined in 24 CFR 92.209(I).

Referral Process

Eligible clients are referred by the contracted service provider.

Notification of Program Ending

As much as possible, program participants will receive notification of program end date at ninety, sixty, and thirty days prior to program end. At a minimum, participants will receive a two-week notice of program end.

HCDS (in collaboration with service providers) will evaluate availability and/or eligibility to HCV or other permanent housing programs for each participant transitioning from the LRSP.

Chapter 20 - FAMILY SELF SUFFICIENCY PROGRAM
[24 CFR 984]

INTRODUCTION

The Family Self-Sufficiency (FSS) is a voluntary program for HACSD Housing Choice Voucher Program participants who are committed to becoming economically self-sufficient.

Part I: Administration of the FSS Program. This part details the HACSD's Action Plan for administering FSS.

Part II: Affirmatively Furthering Fair Housing-FSS. This part explains how the PHA will further fair housing

PART I: ADMINISTRATION OF FSS

20-I.A. OVERVIEW

This Action Plan was developed as required under Section VIII of the Federal Register, Vol. 56, No. 189, dated September 30, 1991. The Action Plan describes the activities the Housing Authority of the County of San Diego (HACSD) will carry out in the implementation and operation of the Family Self-Sufficiency Program (FSS). Modifications to this Action Plan are made in compliance with provisions of Federal Register, Vol. 58, No. 101, Thursday, May 27, 1993, Rules and Regulations and Federal Register, Vol. 87, No. 95, Tuesday, May 17, 2022, Rules and Regulations. This Action Plan was last updated August 2022 in accordance with the provisions of 24 CFR Part 984.

20-I.B. INTRODUCTION

Timetable for Implementation of FSS Program

The HACSD committed to begin the operation of the FSS Program within 12 months of HUD's notification of approval of the first increment of funding in support of the FSS Program. Eligible families selected to participate in the FSS program began to receive supportive services within 12 months of the implementation of the program.

Estimate of Participating Families [24 CFR 984.105]

HUD has established a calculation for a minimum program size for an agency's FSS program. This calculation is based on the number of FSS Incentive slots funded in 1991/1992 and additional funding received from 1993 through October 20, 1998. The HACSD was awarded 75 incentive slots to begin the FSS program in 1992. Additional funding of 86 slots in 1993 and 185 slots in 1994 make the original size of the FSS program 346 families. Beginning October 21, 1998, Housing Authorities could reduce the minimum program size by one for each successful graduate of the agency's FSS program. A successful graduate is one who fulfills their contract of participation obligations. From October 21, 1998, through July 31, 2021, there have been 350 successful graduates from the FSS program. As of August 1, 2021, the minimum program size for the FSS program is 52 families. There were 63 families receiving services as of that date. The HACSD will continue to maintain an FSS Program of at least the number of participants required to meet 80% of the minimum program size and will exceed it, if staffing and funding are available to do so.

Certification of Coordination

The HACSD certifies that the development of services and activities under the FSS program has been and will continue to be coordinated with the JOBS Program; the programs provided under the JTPA, and any other relevant employment, child care, transportation, training, and educational programs to avoid duplication of services and activities.

Optional Additional Information

The HACSD successfully developed, administered and operated the Project Self-Sufficiency Program and the Operation Bootstrap Program. Through these efforts the HACSD assisted more than 100 participants, reducing public dependency by providing them the opportunity of education, training, and other supportive services.

Throughout the more than 36 years of experience with housing programs, the HACSD has implemented the Section 8 Existing Housing Assistance Program, Housing Choice Voucher and

Moderate Rehabilitation Program, the Section 17 Rehabilitation Program, the Conventional Public Housing Program and developed local rental assistance programs for participating cities. In addition, the HACSD has participated with the Department of Health in implementing the National Institute for Mental Health Program, which provides comprehensive services to mentally ill homeless.

The HACSD will operate individually. This FSS Action Plan, unless otherwise modified, will apply to the Section 8 Housing Choice Voucher FSS Program only.

20-I.C. ELIGIBILITY AND SELECTION

FSS Family Selection

The HACSD will select FSS participants from current Housing Choice Voucher participants including all special purpose vouchers. When staffing and/or funding does not allow families to be added to the FSS Program, a waiting list will be maintained. When staffing/funding resumes, families will still be served based on the date their application was received. This ensures families on the waiting list will be served according to application date regardless of race, color, religion, sex, handicap, familial status, or national origin. As provided under the regulations, 50% of the FSS slots may be made available to eligible families who have one or more family members who are: currently enrolled in public assistance benefits such as CalWORKs (formally known as TANF); are in any of the job training programs provided by PIC; are in any other FSS-related service program; or are on the waiting list for such a program. The other 50% of the FSS slots will be allocated to other families on a first-come, first-served basis.

Family Demographics

In September 2022, there were 72 active FSS participants. They fall into the following categories:

HCV Participants	Household Type	FSS Participants
53%	Elderly/disabled households	16%
88%	Small families (1-4 members)	83%
12%	Large families (5+ members)	16%
65%	Non-Hispanic	54%
35%	Hispanic	46%
80%	White	65%
16%	Black	32%
1%	American Indian	1%
3%	Asian	1%
1%	Pacific Islander	1%

It is anticipated that the ethnic and racial representation in the FSS Program will reflect that of the Housing Choice Voucher participant population in the jurisdiction of the HACSD.

The need for supportive services for the low-income families living in San Diego County is no different from the daily challenges of low-income families living elsewhere. Some of these families lack the education or job skills to find a well-paying job; these families lack knowledge of the job market, financial resources to pay for childcare while seeking a job and transportation to seek and

maintain a job. However, in San Diego County these problems are compounded by extremely high housing costs. As a result, San Diego County's low-income households will require, among other services, higher education opportunities and transportation services in order to compete in the current job and rental market. To assist families facing barriers to self-sufficiency, the Housing Authority of the County of San Diego has obtained the following resources and services developed through intra-agency, public, and private partnerships:

- Healthcare Education
- Nutritional Education
- Career Counseling
- Parenting Skills
- Financial Literacy
- Credit Building
- Mental Health
- Housing Navigation
- Food Insecurity Services
- Computer Lab, Printing Services, Wi-Fi Accessibility
- Meeting Spaces
- GED, High School Diploma and/or College Education
- Vocational Training
- Job Training, Preparation, and Placement
- Homeownership Counseling
- Moral Support
- Resource/Service linkage with CalFresh, Medi-Cal, Aging and Independence Services, and other Social Services

20-I.D. DENIAL OF PARTICIPATION

A request for participation in the FSS program may be denied under the following circumstances:

- Beginning April 1, 2008, if the family previously participated in an FSS program with the HACSD or any other housing authority
- If a family has participated in and successfully completed any FSS program
- Family was terminated with Escrow Disbursement

At its discretion, the HACSD may permit a family who has previously participated in any FSS program, but did not successfully complete their contract, to reapply for the FSS program no sooner than one year after the termination date of the contract.

20-I.E. INCENTIVES TO ENCOURAGE PARTICIPATION

An integrated services approach is essential to enhancing the self-esteem of low-income families who have the desire to work but lack the belief that they will be successful. Additionally, this approach will make them aware of new career possibilities, and then provide them with the education and training necessary to achieve their heightened aspirations.

To encourage participation in the FSS program, the HACSD is providing the following incentives:

FSS Escrow Account

The HACSD will establish an escrow account for each FSS participant. The amount deposited into an escrow account represents the increase in rent resulting from an increase in earned income from the initial FSS contract start date. This amount is deposited for the benefit of the

participant into the escrow account by HACSD. The escrow account becomes available to the family after they have fulfilled their obligations under the contract, or if the family meets interim goals and needs the escrow funds to complete their contract.

HACSD participates in quarterly Program Coordinating Committees (PCC) intended to increase awareness of public and private resources. Through the PCC and local efforts, the HACSD will provide information and referrals to the FSS participant for an array of support services. HACSD certifies that the development of the services and activities scheduled to be provided under this FSS program have been coordinated with public and private partners (both PCC members and non-PCC members), including self-sufficiency programs of the Department of Labor and Health and Human Services Agency, and other employment, childcare, transportation, training and education programs. These services will assist participants in removing barriers to self-sufficiency, and may include:

- Transportation
- Child Care
- Nutritional Education
- Career Counseling
- Parenting Skills
- Financial Management
- GED, High School Diploma, and/or
- College Education
- Vocational Training
- Job Training, Preparation and Placement
- Homeownership Counseling
- Moral Support
- Treatment and Counseling for Substance and Alcohol Abuse

Resources

The HACSD has developed and distributes resource information through newsletters and/or emails for FSS participants. These newsletters/emails highlight resources, available services, and accomplishments. Additionally, the FSS team has hosted in-house workshops for participants on topics such as personal finance, credit repair and preparing for college. Resource newsletters may be distributed by mail, email and/or be posted on HACSD website. Also, e-mail blasts are regularly sent to program participants to let them know about available resources such as: job announcements, trainings, and scholarships for specialized programs.

Scholarships

The HACSD may offer scholarships to FSS participants and other household members each semester based on funding availability, once in the spring and once in the fall, during the academic year, depending on funding. As of June 30, 2021, the FSS Scholarship Program has awarded 131 scholarships to FSS participants and their families. These awards total \$114,407 in funds that can be used towards school-related expenses, including tuition, books, transportation, room and board, and more. Scholarships are available in the following amounts: \$500 for undergraduate and graduate level studies; up to \$250 for associates and technical level studies; \$150 for GED and high school certifications.

Scholarship recipients are chosen based on certain criteria including successful completion of the application, completion of an essay, submission of a class schedule and good standing with the Section 8 program. Additional requirements vary by year.

20-I.F. OUTREACH EFFORTS

The HACSD serves nearly 11,000 low-income families under the Housing Choice Voucher program. HACSD employs a multitude of outreach methods such as:

- Holding FSS PowerPoint presentation during briefings
- Sharing and advertising stories of successful FSS graduates using brochures
- Using a web page dedicated to the FSS program to provide information on the benefits of the FSS program and how successful completion of FSS goals can support current and future self-sufficiency goals
- Face-to-face interviews and discussions with potential FSS candidates
- Word of mouth referrals from past and current participants
- Staff and self-referrals
- Provision of curbside materials promoting the FSS Program.

Outreach for the FSS program may be done by sending applications with annual renewal packets, and/or by providing program information to supportive service agencies. Outreach efforts will target both minority and non-minority groups. Referrals may also be accepted from Housing Specialists and other program staff.

Assurance of Non-Interference with the Rights of Non-Participating Families

Participants of the Housing Choice Voucher program will be invited to participate in the FSS program. The invitation will make it very clear that non-participation in the FSS program will in no way affect the family's right to continue rental assistance or their participation in the Housing Choice Voucher program.

20-I.G. FSS ACTIVITIES AND SUPPORTIVE SERVICES

Method for Identification of Family Support Needs

The FSS Program will identify the needs of the interested families by requiring each family to complete a Family Self-Sufficiency Application. Active FSS participants are asked to complete a biannual survey. The answers provided in the application and biannual survey will be evaluated by HACSD staff, and the family will be referred to appropriate resources. Resources may include service providers who assess the specific services the participant would need to meet their particular plan and/or goal in order to lead them to economic self-sufficiency.

Committed Supportive Services

Current services, as indicated under Incentives, that may be provided to FSS participants include:

- | | |
|---|--|
| • Opportunities of Higher Education | • Housing Assistance |
| • Transportation | • Job Training and Referral Services |
| • Individual Counseling by Trained Social Workers | • Child Care |
| • Skills Assessment Services | • Vocational Training |
| • Job Development Counseling | • English as a Second Language (ESL) Classes |

Additional Services

Through existing County of San Diego services, participants may be referred and have access to other services such as:

- Career Development Services
- Health and Preventive Health Care
- Nutrition Classes
- Consumer Rights
- Budgeting Skills
- Legal Services
- Housekeeping and Appliance Maintenance

The HACSD will continue to provide rental assistance to families who meet eligibility criteria and otherwise comply with HUD program requirements and HACSD policy. Participants will be provided information on how to select appropriate housing that meets Housing Quality Standards, and referrals to participating landlords will be furnished whenever possible. Participants will have access to a Housing Specialist assigned to manage their rental assistance contract.

Individual Training and Service Plan Goals

The Individual Training and Services Plan (ITSP) will be developed with the individual FSS participant. HACSD FSS program staff will work with participants to develop employment-related goals that span the term of their contract. Goals may also include homeownership preparation.

Two types of goals will be developed: Long-term or final goals and short-term or interim goals. Goals, both short-term and long-term, will generally follow the “SMART” format:

- **S**pecific, stretch
- **M**easurable, meaningful
- **A**ttainable, agreed upon, action-oriented
- **R**ealistic, reasonable
- **T**ime based, tangible

Live Well Service Plan

To align with *Live Well San Diego*, the County of San Diego’s vision for a region that is Building Better Health, Living Safely and Thriving, FSS participants are encouraged to develop goals in each of the Live Well components (Health, Safety, Thriving). These goals are in addition to and support the participant’s FSS ITSP goals.

Designation of the Head of the FSS Family

A determination of the Head of the FSS Family will be decided by a majority of the legally consenting adult within the family composition by signing the Head of FSS Family Acknowledgment Form to acknowledge the sole designee as Head of the FSS Family.

20-I.H. CONTRACT OF PARTICIPATION

To participate in FSS, the head of the FSS Family must enter into a 5-Year Contract of Participation (CoP) with the HACSD, unless otherwise specified for FUP youth. The Head of the FSS Family is responsible for developing a list of self-sufficiency goals with the support of the FSS Coordinator including signing the CoP after goal development and assuming the role of designee for the FSS Escrow account.

Requirement to Seek and Maintain Suitable Employment

The Head of the FSS Family is required to seek and maintain suitable employment throughout the term of their contract. The HACSD FSS program may require the FSS head of household to provide written verification of these activities.

Employment-related goals for disabled participants will be based on their ability to work.

Contract Changes

A newly executed FSS contract is not to have a retroactive start date. The contract start date can be as soon as the beginning of the next following month. Participants will be allowed to change their goals no more frequently than once per year, and no changes will be allowed in the last six months of their contract term. Only two changes will be allowed in the five-year term of the contract unless extreme hardship can demonstrate the need for additional changes of goals.

Participants enrolled in FSS prior to June 16, 2022, will adhere to the guidelines for FSS action plan commencing September 2013, or may opt into the requirements under FSS Action Plan commencing August 2022. Once the participant opts into the 2022 FSS Action Plan they may not return to the former plan requirements.

Contract Extensions

The initial term of the FSS Contract of Participation is five years. If a family cannot meet their goals within the five years, they may request an extension. The request must be in writing and be made during the last 12 months of their contract. The request must be received at least 30 days before the contract end date. An extension may be granted to a family if they are unable to meet the terms of their contract due to circumstances beyond their control and an extension of time will allow them to complete their contract goals successfully.

Other good cause extensions may be granted for active pursuit of a current or additional goal that will result in the furtherance of self-sufficiency during the period of the extension, or any other circumstance the HACSD deems to be a good cause. Under no circumstance will the total duration of extensions exceed a total of two years, or a maximum of seven years from the first income re-certification (interim or annual) after the execution of the Contract of Participation.

Contract Completion

The FSS Contract of Participation will be considered complete when the family has:

1. Met the goals established in their Contract of Participation, including all family member's ITSPs;
2. Provided the FSS Coordinator(s) written verification and/or documentation indicating the completion of each Contract of Participation goal. The verification/documentation provided for each goal must match each goal; and
3. No member of the FSS family is receiving a welfare benefit of any kind at the time of graduation.

20-I.I. TERMINATION OF CONTRACT OF PARTICIPATION

The FSS Contract of Participation will be terminated if the family's participation in the Section 8 Housing Choice Voucher program is terminated. The FSS Contract of Participation may also be terminated for non-compliance or non-participation in the FSS program. A family may voluntarily request that their FSS contract be terminated. The family's rental assistance will not be terminated for non-compliance or non-participation in the FSS program. [FR Notice 12/29/14].

If a family's FSS contract is terminated (for any reason), any and all money in the family's FSS escrow account will be returned to the HACSD to be used for rental assistance for other families. The family will not be entitled to this money, nor will it be applied to any money owed to the HACSD.

Hearing requests

A hearing will be offered to the participant at the time a negative action is taken including:

- The denial of participation;
- Termination of the FSS contract;
- Forfeiture of FSS Escrow account monies.

The hearing request process will be the same as for the Housing Choice Voucher Program and is described in this Administrative Plan.

20-I.J. ESCROW ACCOUNT

The HACSD will establish an escrow account for each FSS participant. The amount deposited into an escrow account represents the increase in rent resulting from an increase in earned income from the initial FSS contract start date. This amount is deposited for the benefit of the participant into the escrow account by HACSD. The escrow account becomes available to the family after they have fulfilled their obligations under the contract, or if the family meets interim goals and needs the escrow funds to complete their contract.

Eligibility to Receive Escrow Funds

Upon successful completion of the terms of the contract, the HACSD will begin the process to pay out the balance of FSS Escrow account. Interest earned on the FSS escrow account will be added to the escrow balance and paid to the qualifying FSS participant upon completion of the FSS contract. The FSS escrow account only earns interest for the quarter once it has been posted by the Auditor and Controller after each quarter ends. FSS participants graduating mid-quarter will include the interest only through the most recently posted quarter. If the family owes the HACSD money, the debt to the HACSD will be paid first from the escrow account and any balance remaining will be paid to the family.

A family may request an interim payout from their escrow account before they have completed their contract. Interim payouts are intended to help the participant achieve a goal that they would not otherwise be able to achieve. An interim payout will be considered if each of the following criteria are met:

1. The family makes the request in writing explaining the need for the money, the amount requested and who the check should be made payable to; and
2. The family has made demonstrable progress towards their goal; and
3. The amount requested is not more than 30% of the balance of their escrow account at the time of the request; and

4. The family can demonstrate how the money will help them meet their final goals; and
5. The family can demonstrate how all known or available resources have been exhausted.

A maximum of two interim payouts from the FSS escrow account will be allowed per contract term for the participating FSS family.

Forfeiture of Escrow

If a family's FSS contract is terminated (for any reason), any and all money in the family's FSS escrow account will be placed in an FSS Escrow reserve account for FSS families in good standing to utilize to provide support and eliminate barriers to achieving goals of self-sufficiency. FSS Escrow reserves may be used for, but are not limited to, the following resources and services to support FSS families in good standing:

- Transportation
- Childcare
- Training
- Testing fees
- Employment preparation costs
- Other costs related to achieving obligations outlined in the CoP
- Training for FSS Program Coordinators

Requests to utilize FSS Escrow reserves will be reviewed on a case-by-case basis and HACSD has discretion to approve, limit, or deny the disbursement of FSS Escrow reserves to participant based on funding availability, funding limits, and/or the pertinence of the requested use of FSS Escrow reserves relative to the CoP goals.

Termination with Escrow Disbursement

An FSS family may request an escrow disbursement under the circumstances of a good-cause termination where graduation is not feasible under the following scenarios:

- The HACSD and family agree that one or more services/resources are both critical and unavailable;
- The Head of the FSS family becomes permanently disabled and unable to work after having earned escrow and there is no other household member able or willing to assume the Contract of Participation; or,
- The family ports in a situation where they are unable to continue the Contract of Participation, have not yet met the requirements for graduation, and the HACSD determines that there is good cause for termination with escrow disbursement.

20-I.K. FSS PORTABILITY

FSS Family Port-In

If a family is exercising the portability option and is moving into the HACSD's jurisdiction and is an active participant of the initial HA's FSS program, the family will be admitted to the HACSD's FSS program and the voucher will be absorbed. The family must sign a new FSS contract with the HACSD; however, the original contract information and dates will be continued. The goals and activities will be re-evaluated.

If the HACSD is administering vouchers on behalf of the initial Housing Authority for families porting into the HACSD, the voucher will only be absorbed once the new contract is signed.

When the family ports in, the family will be contacted to see if they would like to be admitted into the HACSD's FSS program. If the family wishes to continue their FSS program, with HACSD, the initial Housing Authority will be contacted for a copy of the family's original FSS contract and escrow account balance. When both have been received, a new FSS contract will be executed with the family to continue the term of their original contract.

The HACSD will not allow a family using the portability option to be admitted to a receiving agency's FSS program until the receiving agency absorbs the family's voucher.

Non-FSS Family Port-In

If a family is porting in and wishes to join FSS, and HACSD is absorbing their voucher, the family will go on the FSS waiting list until such time as their name is pulled from the list. If HACSD is not absorbing, and is administering the voucher, the family will remain on the FSS waiting list until HACSD is able to absorb the voucher. In both cases the family remains on the waiting list until such time as the voucher has been absorbed by HACSD and the family has also been pulled from the FSS waiting list.

FSS Participant Port Out

If a FSS participant wishes to port out of the HACSD jurisdiction, they may take their FSS contract with them, if certain circumstances are met:

1. The family must have been enrolled in and participating the HACSD's FSS program for at least 12 months before porting out.

AND

2. The receiving Housing Authority will absorb the family's voucher and FSS contract.

If the family decides to move before the end of the 12 months or if the receiving agency will not absorb their voucher and FSS contract, the family's FSS contract will be terminated, and any escrow money will be returned to the HACSD's FSS Escrow Reserves.

Exhibit 20-1: FSS Action Plan Comparison

FSS Plan prior to 6/16/22	FSS Plan on or after 6/16/22	Key Change
Head of Household Under the previous FSS Regulations, the Head of Household (HoH) was the only family member allowed to sign the FSS Contract of Participation (CoP). This means the HoH was the only household member eligible to accrue escrow. If the HoH was unable to work due to a disability, the family would not be able to receive any escrow funds through increasing their earned income.	Head of FSS Family Under the new FSS Regulations, the Head of the FSS Family does not need to be the Head of Household (HoH). The Head of the FSS Family must be an adult designated by other legally consenting adults in the household to be the Head of the FSS Family.	Any adult designated by the family can be the Head of the FSS Family as opposed to the HoH being designated as the Head of the FSS Family.
Termination with Escrow Disbursement Under the previous FSS Regulations, there was no provision for termination with escrow disbursement.	Termination with Escrow Disbursement Under the new FSS Regulations, An FSS Family may request an escrow disbursement under circumstances of a good cause termination, where graduation is not feasible under the following scenarios: <ol style="list-style-type: none"> 1. The HACSD and family agree that one or more services/resources are both critical and unavailable. 2. The Head of the FSS Family becomes permanently disabled and unable to work after having earned escrow and there is no other household member able or willing to assume the Contract of Participation. 3. The family ports in a 	FSS regulations now allow for good cause terminations with escrow disbursement

	<p>situation where they are unable to continue the CoP but have not yet met the requirements for graduation and the HACSD determines there is good cause for termination with escrow disbursement.</p>	
<p>Contract of Participation - Under the previous FSS Regulations, the HoH was required to sign a five-year CoP, which commenced on the first of the month following the month the CoP was signed. Additionally, the end date of the CoP was five years minus one day from the commencement of the CoP.</p>	<p>Contract of Participation - Under the new FSS Regulations, the Head of the FSS Family is required to sign a CoP, which commences on the first of the month following the month the CoP is signed. Additionally, the end date of the CoP is five years minus one day from the first income re-certification (interim or annual) after the execution of the CoP.</p>	<p>End date of the CoP is five years minus one day from the first income re-certification (interim or annual) instead of the commencement of the CoP.</p>
<p>Requirement to Seek and Maintain Suitable Employment - Under the previous HACSD FSS Action, the HACSD required FSS Participants to be working 32 hours per week by contract completion if the participant's goal was to be working full-time.</p>	<p>Requirement to Seek and Maintain Suitable Employment - Under the new FSS Regulations, no working hour requirements can be on placed on FSS Participants, as suitable employment is based on each family's unique and individual circumstances.</p>	<p>Removal of the 32-hour full-time employment requirement.</p>
<p>Good Cause Extensions - Under the previous FSS Regulations, "Good Cause Extensions" were only granted when the family was unable to meet their goals for circumstances beyond the family's control.</p>	<p>Good Cause Extensions - Under the new FSS Regulations, "Good Cause Extensions" are granted when the family was unable to meet their goals for circumstances beyond the family's control; active pursuit of a current or additional goal that will result in the furtherance of self-sufficiency during the period of the extension; or any other</p>	<p>Added additional good cause extensions for active pursuit of a current or additional goal, and any other circumstance the HACSD deems to be a good cause.</p>

	circumstance the HACSD deems to be a good cause.	
Contract Completion FSS contracts are considered complete when the family: <ol style="list-style-type: none"> 1. Meets the goals established in their Contract of Participation; and 2. Progress in their career during the time on the FSS program; and 3. Have not received any kind of welfare benefit for the last 12 months of their contract. OR <ol style="list-style-type: none"> 1. 30% of the family's monthly adjusted income equals or exceeds the SAFMR for the size unit for which the family qualifies for; and 2. The family had not received any kind of welfare benefit for the last 12 months of their contract. 	Contract Completion FSS contracts are considered complete when the family: <ol style="list-style-type: none"> 1. Meets the goals established in their Contract of Participation, including all family member's ITSPs; 2. Provides the FSS Coordinator(s) written verification and/or documentation indicating the completion of each Contract of Participation Goal. The verification/documentation provided for each goal must match each goal. 3. Have not received a welfare benefit of any kind of at the time of graduation (this provision includes everyone who is a part of the household composition). 	Removed 30% rule and requirement for the FSS Family to be welfare-free for the last 12 months of their FSS contract. Families only need to be welfare free at the time of graduation.
Forfeited Escrow Under the previous FSS Regulations, forfeited escrow was released back to the HAP to provide rental assistance for HCV families in good standing.	Forfeited Escrow Under the new FSS Regulations, forfeited escrow is released to FSS Escrow Reserves for FSS families in good standing to utilize to provide support and eliminate barriers to achieving goals of self-sufficiency.	Forfeited escrow may no longer be used for HAP. Eligible uses for forfeited include but are not limited to training for FSS Program Coordinator(s), transportation, childcare, training, testing fees, employment preparation costs, and any other support or resources that would eliminate barriers to achieving goals of self-sufficiency for FSS families in good standing.

PART II: AFFIRMATIVELY FURTHER FAIR HOUSING- FSS PROGRAM

[24 CFR 984.104(c)]

20-II.A. OVERVIEW

An FSS program established under this part shall be operated in compliance with the nondiscrimination and equal opportunity requirements set forth in 24 CFR part 5, with the exception of Executive Orders 11246, 11625, 12432, and 12138.

20-II.B. AFFIRMATIVELY FURTHERING FAIR HOUSING- FSS PROGRAM

In the administration of its Family Self-Sufficiency program, the HACSD will follow the processes and procedures already established in the Section 8 Housing Choice Voucher Program Administrative Plan (Chapter 2) and:

- Market the Family Self-Sufficiency program equally to all eligible Section 8 Housing Choice Voucher families, including to persons with disabilities and to persons with limited English proficiency.
- Ensure buildings and communications that facilitate applications and service delivery are accessible to persons with disabilities.
- Provide referrals to fair housing agencies as needed or requested.
- Inform participants how to file a fair housing complaint including providing the toll-free number for the Housing Discrimination Hotline.

20-II.C. RECORDS MANAGEMENT

Records will be maintained in individual case files and in FSS Coordinator files that document participant referrals to fair housing agencies. Information on race, ethnicity, familial status, and disability status of FSS program participants and all Section 8 Housing Choice Voucher participants is kept and transmitted to HUD regularly via form HUD-50058.

Exhibit 1 – HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT (HOTMA) of 2016

BACKGROUND; Notice PIH 2023-27

The Housing Through Modernization Act (HOTMA) was signed into law on July 29, 2016 (Public Law 114–201, 130 Stat. 782). The HOTMA statute consists of 14 sections of law that affect the Public Housing and Section 8 rental assistance programs. On September 17, 2019, HUD issued a proposed rule to update its regulations according to HOTMA's statutory mandate. The proposed rule may be found at 84 FR 48820 (September 17, 2019).

Sections 102 and 104 of HOTMA make sweeping changes to the United States Housing Act of 1937 (1937 Act), particularly those affecting income calculations and reviews. Section 102 changes requirements related to income reviews for Public Housing and Section 8 programs. Section 104 sets maximum asset limits for Public Housing and Section 8 applicants and participants.

Section 102 of HOTMA applies to all PHAs operating a Housing Choice Voucher (HCV) (including Project-Based Vouchers), Public Housing; Section 8 Moderate Rehabilitation, or Section 8 Moderate Rehabilitation Single Room Occupancy (SRO), including Moving to Work (MTW) Agencies (see Section 4 (Notice Applicability) of this notice). Section 102 also applies to the following programs administered by MFH: Section 8 Project Based Rental Assistance (PBRA), 202/8, 202/162 Project Assistance Contract (202/162 PAC), Section 202/811 Capital Advance with Project Rental Assistance Contract (202/811 PRAC), non-insured 236 projects with Interest Reduction Payments (236 IRP), Section 811 Project Rental Assistance Demonstration (811 PRA), and Senior Preservation Rental Assistance Contracts (SPRAC).

Section 104 of HOTMA applies to all PHAs operating an HCV, Public Housing, Section 8 Moderate Rehabilitation, or Section 8 Moderate Rehabilitation SRO program, including MTW Agencies (see Section 4 (Notice Applicability) of this notice). Section 104 also applies to the following programs: Section 8 PBRA and 202/8. Section 104 does not apply to following programs: 202/811 PRAC, 236 IRP, 811 PRA, and SPRAC.

Overview

Compliance Date and Required Actions for PHAs (Office of Public and Indian Housing)

To comply with HOTMA, PHAs must be able to submit transactions to the Housing Information Portal (HIP). This requires the PHA's software vendor to make system updates and fully convert to making all submissions to HIP. Each PHA will set its own compliance date as early as January 1, 2024, but no later than January 1, 2025. "Compliance" means, in this instance, utilizing the HOTMA rules as it applies to the affected programs and corresponding reporting in HIP.

On July 3, 2024, HUD sent an email to the PHA Directors stating that HUD has rescinded Notice PIH 2024-12 entitled "Housing Information Portal Implementation" and will issue more guidance once the HIP Implementation schedule. HUD also announced that HOTMA may be delayed, future guidance will be released regarding a timeline for compliance with section 102 and 104. Additionally, HUD advised PHAs not to begin conducting reexaminations under HOTMA rules without further information on when the HOTMA c-compliant HUD-50058 in HIP will be available.

HACSD Policy

HACSD's compliance date for HOTMA is contingent upon further guidance from HUD. HOTMA policies will not be applied to any type of certification until a compliance date is established by HUD.

The following sections in this exhibit have been updated to reflect the HOTMA regulatory changes and HACSD policy. Updated sections are underlined.

HOTMA Update: Chapter 3, Section 3-I.B.; 24 CFR 5.403; 982.201 (c)

- Update: Definition of family to include transition aged youth.
- Description of Change: Added youth as new category of single person

3-I.B. FAMILY AND HOUSEHOLD

[24 CFR 982.201(C); FR Notice 02/03/12; Notice PIH 2014-20]

The terms family and household have different meanings in the HCV program.

Family

To be eligible for assistance, an applicant must qualify as a family. Family as defined by HUD include, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older; or a group of persons residing together. Such group includes but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual Orientation means homosexuality, heterosexuality, or bisexuality.

HACSD Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.

The HACSD will include a registered domestic partnership, as recognized by state law, in the definition and all references to marriage outlined in this Plan.

Each family must identify the individuals to be included in the family at the time of application and must notify HACSD if the family's composition changes.

Household

Household is a broader term that includes additional people who, with PHA permission, live in an assisted unit, such as live-in aides, foster children and foster adults.

HOTMA Update: Chapter 3, Section 3-I.K.; 24 CFR 5.609

- Update: Definition: Foster adult and child
- Description of Change: Added a state law component to the definition

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

A *foster adult* is a member of the household who is 18 years of age or older and meets the definition of a foster adult under State law. In general, this usually includes persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609].

A *foster child* is a member of the household who meets the definition of a foster child under State law. In general, a foster child is placed with the family by an authorized placement agency or by court order.

Foster children and foster adults who are living with an applicant or who have been approved by the PHA to live with a participant family are considered household members but not family members. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].

HACSD Policy

A foster child is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in a violation of HQS space standards according to 24 CFR 982.401.

Documentation must be submitted to verify the identity of the foster children/adults, to confirm they are foster children/adults, to confirm the foster children/adults are legal U.S. residents and the benefits are paid on behalf of the foster children/adults.

Foster children/adults are not subject to non-citizen rule requirements, but the placement agency must confirm they are legal U.S. residents.

A streamlined documentation process is acceptable for foster children/adults expected to be in the household for a short period of time. Foster children/adults expected to be in the household at least one year are considered a part of the family in determining the subsidy standards and income limits.

The criminal history of adult foster children must be verified prior to admission to the household and whenever the criminal history of adult family members is reviewed. Adult foster children must sign release of information forms so that criminal history can be verified.

Foster children/adults may not be considered remaining members of the tenant family.

HOTMA Update: Chapter 3, Section 3-I.L.

- Update: Remaining household member section
- Description of change: Update reference to medical expense

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons including educational activities, placement in foster care, employment, illness, incarceration, and court order.

Family Members Permanently Confined for Medical Reasons [HCV GB]

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB].

HACSD Policy

An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If a family member leaves the household to enter a facility such as a hospital, nursing home, or rehabilitation center, the HACSD will require verification from a reliable, qualified source as to the likelihood of their return, and the anticipated **length** of their absence.

Sole Family Member

If the verification indicates the sole family member is permanently confined to a nursing home, s/he will be considered permanently absent, and assistance will be terminated. If the verification indicates the sole family member may return in less than 180 consecutive days or is unsure when the sole family member will return, the family member may be considered temporarily absent.

Remaining Household Member

If a family member is confined to a hospital or nursing home for an indefinite duration, and there is a family member left in the household, the HACSD will calculate the lower family rent by comparing the following methods:

- Exclude the income of the person confined to the nursing home, give the family no deductions for the health and medical care expenses of the confined family **member**, and review and reduce the family's voucher size, if appropriate; or
- Include the income of the person confined to the nursing home and give the family the medical deductions allowable on behalf of the person in the nursing home.

HOTMA Update: Chapter 3, Section 3-III.B.; 24 CR 5.618; 982.552 (b)(6)

- Update: Mandatory denial due to limit on net assets and property ownership
- Description of Change: Added citation, added asset restriction to mandatory denial list

3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.552(b)(6); 24 CFR 982.553(a)]

HUD requires the PHA to deny assistance in the following cases:

- Households are subject to the restrictions on net assets and property ownership as required by 24 CFR 5.618 and as outlined in Chapter 6 of this Plan.
- Any member of the household has been evicted from federally-assisted housing in the last 3 years for drug-related criminal activity, beginning on the date of the eviction. HUD permits, but does not require, the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household).

HACSD Policy

The HACSD may admit the applicant, if after considering the individual circumstances of the household, the HACSD determines that:

- Full restitution, including the cost of eviction, was made to the landlord, if lease violations occurred as a result of the criminal activity; and
- The evicted household member who engaged in drug-related criminal activity has successfully completed a supervised drug rehabilitation program approved by the HACSD; or
- The circumstances leading to eviction no longer exist because the criminal household member has died.
- The criminal household member is no longer in the household and the head of household has certified that the criminal family member will never be allowed to return to visit the family. The head of household must certify that s/he understands that if the criminal family member is allowed to return to visit, the family's program participation will be terminated.

The HACSD may waive the prohibition of program admission for drug-related criminal activity for personal use or a pattern of alcohol abuse, if:

- The person demonstrates successful completion of a credible rehabilitation program approved by the HACSD, or evidence of otherwise having been rehabilitated, and the violation did not occur while the family was being assisted.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516; 982.551; CFR 5.230; and Notice PIH 2023-27]

Consent Forms

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 982.551]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance. While PHAs must use form HUD-9886, this form does not release all the information necessary to the administration of the program. The PHA must also develop its own release forms to cover all other necessary information.

Form HUD-9886 [24 CFR 5.230(b)(1), b(2), (c)(4), and (c)(5); and Notice PIH 2023-27]

All adult applicants and participants sign form HUD-9886, Authorization for Release of Information. All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886 at admission. Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886 be signed only once. On or after January 1, 2024 (regardless of the PHA's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886 at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886 will not be submitted to the PHA except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

The PHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. PHAs must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Adult family members are those who are expected to be 18 years of age or older at the time of annual recertification, transfer, or final eligibility determination.

All required releases must be completed "as is" by all adult family members, live-in aides and adult foster children. These forms may not be crossed out, amended, added to, or in any way altered. To do so is a program violation.

In addition, adult family members, live-in aides and adult foster children must sign additional release of information authorization forms, not covered by the above HUD required form.

Adults who are required to sign forms to release specific information will be provided copies of the forms for their review and signature.

The PHA may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the PHA determines, the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA must deny admission to applicants and terminate assistance of participants. The family may request an informal review (applicants) or informal hearing (participants) in accordance with PHA procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance or admission [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family's executed consent forms.

HACSD Policy

The HACSD has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with HACSD policy.

In order for a family to revoke their consent, the family must provide written notice to the HACSD.

Within 10 business days of the date the family provides written notice, the HACSD will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the PHA will notify their local HUD office.

7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

PHAs may, but are not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs. PHAs are not required to accept or use determinations of income from other federal means-tested forms of assistance. If the PHA adopts a policy to accept this type of verification, the PHA must establish in policy when they will accept Safe Harbor income determinations and from which programs. PHAs must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs.

Means-tested federal public assistance programs include:

- Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.);
- Medicaid (42 U.S.C. 1396 et seq.);
- Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.);
- Earned Income Tax Credit (EITC) (26 U.S.C. 32);

- Low-Income Housing Tax Credit (LIHTC) program (26 U.S.C. 42);
- Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC) (42 U.S.C. 1786);
- Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.);
- Other programs administered by the HUD Secretary;
- Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and
- Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the *Federal Register*.

If the PHA elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, PHAs will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618. The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the PHA:

- Income determination effective date;
- Program administrator's signature date;
- Family's signature date;
- Report effective date; or
- Other report-specific dates that verify the income determination date.

The only information that PHAs are permitted to use to determine income under this method is the total income determination made by the federal means-tested program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by the PHA. PHAs are not permitted to mix and match Safe Harbor income determinations and other income verifications.

If the PHA is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, the PHA must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter.

If the PHA uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet the PHA's reporting requirement and occur after the effective date of the transaction.

The amounts of unreimbursed reasonable attendant care expenses and child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. PHAs are therefore required to obtain third-

party verification of the applicable employment income and cap the respective expense deductions accordingly.

HACSD Policy

When available and applicable, the HACSD will accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The HACSD will still require third-party verification of all deductions such as the health and medical care expense or child care expense deductions. Further, if the family is eligible for and claims the disability assistance expense or child care expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.

Prior to using any Safe Harbor determination from another program, the HACSD will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the HACSD will obtain third-party verification of all sources of income and assets (as applicable).

The HACSD will not accept other programs' determinations of income for any new admission or interim reexamination.

With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the HACSD will accept Safe Harbor determinations from any of the programs listed above.

In order to be acceptable, the income determination must:

- Be dated within 12 months of the dates listed above;
State the family size
- Be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members); and
- Must state the amount of the family's annual income.

The determination need not list each source of income individually. If the HACSD does not receive any acceptable income determination documentation or is unable to obtain documentation, then the HACSD will revert to third-party verification of income for the family.

When families present multiple verifications from the same or different acceptable Safe Harbor programs, the HACSD will use the most recent income determination, unless the family presents acceptable evidence that the HACSD should consider an alternative verification from a different Safe Harbor source.

When the HACSD uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the HACSD. Depending on when the change occurred, the change may or may not impact the HACSD'S calculation of the family's total annual income. Changes that occur between the time the HACSD receives the Safe Harbor documentation and the effective date of the family's annual reexamination will not be considered. If the family has a change in income that occurs after the annual reexamination effective date, the HACSD will conduct an interim reexamination if the change meets the requirements for

performing an interim reexamination as outlined in Chapter 11. In this case, the HACSD will use third-party verification to verify the change.

7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]

HUD permits PHAs to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years, the PHA may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or other inflationary adjustment factor. Streamlining policies are optional. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.

Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.

Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources.

When 90 percent or more of a family's unadjusted income is from fixed sources, the PHA may apply the inflationary adjustment factor to the family's fixed-income sources, provided that the family certifies both that 90 percent or more of their unadjusted income is fixed and that their sources of fixed income have not changed from the previous year. Sources of non-fixed income are not required to be adjusted and must not be adjusted by a COLA, but PHAs may choose to adjust sources of non-fixed income based on third-party verification. PHAs have the discretion to either adjust the non-fixed income or carry over the calculation of non-fixed income from the first year to years two and three.

When less than 90 percent of a family's unadjusted income consists of fixed income, PHAs may apply a COLA to each of the family's sources of fixed income. PHAs must determine all other income using standard verification requirements as outlined in Notice PIH 2023-27.

HACSD Policy

When the HACSD does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, the HACSD may conduct a streamlined reexamination of income for elderly families and disabled families when 100 percent of the family's income consists of fixed income.

Regardless of the percent of a family's unadjusted income from fixed income sources:

- The HACSD will streamline the annual reexamination process by applying the verified COLA/inflationary adjustment factor to fixed-income sources.
- The family will be required to sign a self-certification stating that their sources of fixed income have not changed from the previous year.
- The HACSD will document in the file how the determination that a source of income was fixed was made.
- If the family's sources of fixed income have changed from the previous year, the HACSD will obtain third-party verification of any new sources of fixed income.

- All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.
- HACSD will obtain third party verification of fixed income every three years.

In the following circumstances, regardless of the percentage of income received from fixed sources, the HACSD will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

- Of all assets when net family assets exceed \$50,000;
- Of all deductions and allowances from annual income;
- If a family member with a fixed source of income is added;
- If verification of the COLA or rate of interest is not available;
- During the intake process and at least once every three years thereafter.

7-I.D. VERIFICATION HIERARCHY [Notice PIH 2023-27]

When the PHA does not use a streamlined determination of income or an income determination from a means-tested federal assistance program, HUD requires the PHA to obtain third-party verification of:

- Reported family annual income;
- The value of net family assets when the net value exceeds \$50,000 (as adjusted annually);
- Expenses related to deductions from annual income; and
- Other factors that affect the determination of adjusted income.

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

In order of priority, the forms of verification that the PHA will use are:

HUD developed a hierarchy that described verification documentation from most acceptable to least acceptable. The PHA must demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed.

In order of priority, the hierarchy is:

- Highest: Level 6: Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Highest: Level 5: Up-front Income Verification (UIV) using a non-EIV system
- High: Level 4:
 - Written third-party verification from the source, also known as "family-provided verification"

correctional facility stating how long s/he will be incarcerated.

- Verification from a medical professional if a family member is confined to a nursing home or hospital on a permanent basis.

The HACSD will accept a notarized self-certification, signed under penalty of perjury, from the head of household, or the spouse or co-head, if the head is the absent member.

Foster Children and Foster Adults

HACSD Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

The verification must include name, address, telephone number and contact name and telephone number of the placement agency; and, name, date of birth, social security number, the estimated length of placement, the residency status, and type and monthly amount of benefits of the foster adult/child.

A foster adult must sign the necessary consent forms to verify criminal history.

Change in Family Composition

The HACSD may verify changes in family composition, either reported or unreported, through letters, telephone calls, utility records, inspections, landlords, neighbors, credit data, school or Department of Motor Vehicles (DMV) records, and other sources.

7-II.E. VERIFICATION OF STUDENT STATUS

General Requirements

HACSD Policy

The HACSD requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

- The family includes a student enrolled in an institution of higher education other than the head, spouse, or cohead.
- The family reports childcare expenses to enable a family member to further their education.
- The “Student Eligibility Checklist” must be completed and retained in the file for all students 18 years of age and older.

Verification of full-time student status must include one of the following:

- Written verification from the registrar’s office or other school official
- School records indicating enrollment for the sufficient number of credits to be considered a full-time student by the educational institution
- Copy of student’s registration information indicating the semester and the number of credits taken

If the status is questionable, the family may be required to provide verification of completion of classes (e.g. transcript) to verify that the student maintained their full-time student status. If the full-time student did not maintain their full-time status and assistance was overpaid, an overpayment agreement will be calculated and executed.

Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.

HACSD Policy

In accordance with the verification hierarchy described in section 7-1.B, the HACSD will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

- The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see section Exhibit 3-2).
- The student is at least 24 years old.
- The student is a veteran, as defined in section 3-II.E.
- The student is married.
- The student has at least one dependent child, as defined in section 3-II.E.

- The student is a person with disabilities, as defined in section 3-II.E, and was receiving assistance prior to November 30, 2005.

If the HACSD cannot verify at least one of these exemption criteria, the HACSD will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, the HACSD will then proceed to verify either the student's parents' income eligibility (see section 7-III.J) or the student's independence from their parents (see below).

Independent Student

HACSD Policy

The HACSD will verify a student's independence from their parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

- Either reviewing and verifying previous address information to determine whether the student has established a household separate from their parents for at least one year, or reviewing and verifying documentation relevant to determining whether the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)
- Reviewing the student's prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

A birth certificate is not an acceptable verification of eligible immigration status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept five years.

PHA Verification [HCV GB, pp. 5-3 and 5-7]

Non-citizens with eligible immigration status must sign a declaration of status and verification consent form, with the exception of live-in aides and foster children/adults, and all household members including live-in aides, must provide original immigration documents. Front and back copies are retained and the original immigration documents are returned to the family. The HACSD verifies the eligible immigration status through the USCIS SAVE system. If the initial search fails to verify status, the HACSD will request, within 10 days, that the USCIS conduct a second manual search. If the documents have an expiration date, the applicants/participants must provide either a current document or an USCIS screen print of their current status.

A live-in aide's legal residency will be confirmed through documents. The legal residency of foster children/adults will be verified with the placement agency.

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

Failure to Provide

If an applicant or participant family member fails to sign required declarations and consent forms and/or provide current documents or an USCIS status screen print, as required, s/he must be listed as an ineligible member. If the entire family fails to provide and sign documents as required, the family may be denied or terminated for failure to provide required information. A live-in aide will be prohibited admission to the household to serve as a live-in aide if the live-in aide fails to provide documentation of legal residency.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined placement on the waiting list.

HACSD Policy

The following preferences are applicable at the time of selection from the Waitlist.

Residency Preference: This preference applies to families who live or includes a member who works or has been notified they have been hired to work in the HACSD jurisdiction regardless of length of time.

Acceptable documentation includes two or more of the following documents that indicate the current reported resident or employment address:

- Rent receipts, leases, utility bills, employer or agency records, school records, driver's licenses, voter's registration records, credit reports, bank statements,

benefits award letter, or statement from household with whom the family is residing. If homeless, a lesser standard of documentation is acceptable.

- Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Families with Dependent Children Preference: To be eligible for this preference, the family must provide documentation that there are dependent children in the household or dependent children will be in the household once assistance is approved. A pregnant single person is no different than any other single applicant and is not considered a family with dependent children for admission preference purposes.

In most instances, self-certification is acceptable, unless there is reasonable doubt, in which case the HACSD will ask for further documentation of the placement of the children. This documentation of residence of the children may include:

- School records, Court custody documents, leases, welfare agency information, and medical records.

Veterans Preference: This preference is available to active members of the U.S. Armed Forces, veterans (a veteran with a dishonorable discharge does not qualify for this preference), or surviving spouses of veterans.

The HACSD will require U.S. government documents that indicate that the applicant qualifies under the above definition.

Working Preference: This preference is available to families with:

- The Head of household, spouse or sole household member is employed at the time of selection (must have worked an average of at least 20 hours per week for the previous 6 months). Applicants may combine job training and employment preparatory academic program participation as part of the previous 6-month requirement.
- The Head of household, spouse or sole household member is receiving unemployment, disability, or worker's compensation benefits.
- The Head of household, spouse or sole member is age 62 or older or a person with disabilities [24 CFR 982.207(b)(2)].

Families who claim to work in the jurisdiction of the HACSD must provide an employer's verification and copies of pay stubs.

Disability Preference: This preference is available to families with a head of household or spouse who is a person with disabilities, as defined by HUD.

- The HACSD will request appropriate documentation from a knowledgeable health professional. The HACSD will not inquire as to the nature of the disability but will ask a knowledgeable health professional to confirm that the person meets the HUD definition of disability.
- Other acceptable documentation of disability is either an award letter, or proof of eligibility for social security disability or supplemental security income.

The HACSD may accept as a reasonable accommodation other credible evidence that the person meets the disability definition.

Elderly Preference: This preference is available to families with a head of household or spouse who is 62 years of age or older.

- The HACSD will require appropriate proof of age as verified by submittal of one or more of the following documents: birth certificate, passport, driver's license or resident alien card.

Homeless Preference: The documentation requirement is less stringent for homeless households, given the absence of a permanent residence. A notarized self-certification is required if the homeless household cannot provide documentation of employment/residence in the jurisdiction of the HACSD. In addition to the notarized self-certification, documentation must be provided to demonstrate residence in the jurisdiction of the HACSD around the time of selection from the waiting list.

- Acceptable documentation includes the following: driver's license, automobile registration, documentation from a San Diego County benefit provider, or receipts from stores, restaurants, motels, etc.

Special Local Preference for Homeless Applicants, Regional Taskforce on the Homeless agency members: The documentation is significantly more stringent for homeless households claiming a special local preference. In addition to the applicable documents listed above, documentation must include:

- PHA-approved referral documentation.

Special Local Preference for Non-Elderly Disabled Applicants who are homeless or exiting institutions-HHSA involved: The documentation for non-elderly disabled households claiming this special local preference is detailed in Chapter 18-I. Documentation for exiting an institution includes a certification from a medical provider. Documentation of homeless status is as listed above. In addition, documentation for each preference must include:

- PHA approved referral documentation

Special Local Preference for Victims of Domestic Violence in the HACSD's Public Housing:

- Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from the HACSD's waiting list because a family member has been determined to be the victim of domestic violence.

Special Local Preference for Families that must be Relocated from the HACSD's Public Housing Unit:

- Verification is an original signed and dated referral letter from the HACSD's Public Housing administrator advising the intake Supervisor that the HACSD Public Housing family is eligible for a special local preference for selection from

excluded and the remainder is included in annual income (for example, the income of an adult full-time student).

HACSD Policy

The HACSD will accept the family's self-certification as verification of fully excluded income.

The HACSD will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.L. ZERO INCOME STATUS REVIEWS [Notice PIH 2023-27]

A *zero income review* is an assessment, sometimes periodic, performed by the PHA of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. In calculating annual income, PHAs must not assign monetary value to nonmonetary in-kind donations from a food bank or similar organization received by the family [24 CFR § 5.609(b)(24)(vi)]. PHAs that perform zero income reviews must update local discretionary policies, procedures, and forms. Families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the Form HUD-50058.

HACSD Policy

There is no minimum income requirement. However, families who report zero or minimal income are required to complete a written certification every 30 days, and provide copies of expense receipts for the 30-day period.

The HACSD will check UIV sources and/or may request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income, child support, etc., are not being received by families claiming to have zero annual income.

The HACSD may run a credit report on the family.

The HACSD may require a family's notarized self-certification, signed under penalty of perjury, stating that it has no income, and explaining how it expects to meet its needs.

The HACSD will also require that each family member who claims zero income status complete a zero-income form. If any sources of income are identified on the form, the HACSD will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income.

The HACSD will only conduct interims in accordance with HACSD policy in Chapter 11.

7-III.M. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]

The regulations under HOTMA distinguish between two categories of student financial assistance paid to both full-time and part-time students. Any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)]. Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education not otherwise excluded by the federally mandated income exclusions are included [24 CFR 5.609(b)(9)(ii)].

HACSD Policy

The HACSD will request written third-party verification of both the source and the amount of student financial assistance. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, unless the student's only source of assistance is assistance under Title IV of the HEA, the HACSD will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution.

If the HACSD is unable to obtain third-party written verification of the requested information, the HACSD will pursue other forms of verification following the verification hierarchy in section 7-I.B.

7-III.N. parental income of students subject to eligibility restrictions

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from their parents or a *vulnerable youth* in accordance with PHA policy [24 CFR 5.612, FR Notice 4/10/06, p. 18146, and FR Notice 9/21/16].

This provision does not apply to students residing with parents who are seeking or receiving HCV assistance. It is limited to students who are seeking or receiving assistance on their own, separately from their parents.

HACSD Policy

The income of the parents of a non-independent student will be counted to determine income eligibility based on a written certification, under penalty of perjury, completed by the parents. The HACSD will determine the income eligibility of the non-independent student's parents as follows:

If the student's parents are married and living together, the HACSD will obtain a joint income declaration and certification of joint income from the parents.

If the student's parent is widowed or single, the HACSD will obtain an income declaration and certification of income from that parent.

If the student's parents are divorced or separated, the HACSD will obtain an income declaration and certification of income from each parent.

If the student has been living with one of their parents and has not had contact with or does not know where to contact their other parent, the HACSD will require the student to submit a certification describing the circumstances and stating that the student does not receive financial assistance from the other parent. The HACSD will then obtain an income declaration and certification of income from the parent with whom the student has been living.

The HACSD will use the income limits that apply where the parent with the highest income lives.



Carlsbad Housing Agency

Housing Choice Voucher Program Administrative Plan

Effective July 1, 2023

Housing & Homeless Services Department
1200 Carlsbad Village Drive
Carlsbad, CA 92008

Approved by the Housing Commission on March 16, 2023
Approved by the Community Development Commission on April 4, 2023



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Exhibit 13-3: CHA's Model Emergency Transfer Plan – [Form HUD-5381](#)

Exhibit 13-4: CHA's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, [Form HUD-5383](#)

Chapter 1 – HCV Program Overview

A. Introduction.

The Housing Choice Voucher (HCV) program, formerly known as “Section 8”, is the federal government’s major program for providing rental assistance for extremely low and very low-income program participants. The Carlsbad Housing Agency, as a Public Housing Agency (PHA) authorized by state law, administers the HCV program through an Annual Contributions Contract (ACC) with the U.S. Department of Housing and Urban Development (HUD).

The Carlsbad Housing Agency, herein referred to as the “CHA”, provides rental assistance to qualified program participants, as further detailed in this Administrative Plan. Administration of the HCV program and the functions and responsibilities of CHA staff members shall comply with the City of Carlsbad’s Personnel Policies, HUD regulations, as well as all federal, state and local fair housing laws and regulations.

The City of Carlsbad is committed to meeting local housing needs and collaborates with the San Diego Association of Governments (SANDAG) and within the county to encourage region-wide application of federal and state housing programs.

B. Local Objectives.

The CHA’s mission is to promote adequate and affordable housing, based on the needs of low-income, very low-income, and extremely low-income families within the city of Carlsbad.

The HCV program is designed to achieve three major objectives:

1. To provide affordable decent, safe and sanitary rental housing in compliance with housing quality standards for very low-income families.
2. To promote freedom of rental housing choice and spatial deconcentration of very low-income families of all racial and ethnic backgrounds.
3. To provide an incentive to private property owners to rent to very low-income families by offering timely assistance payments and annual inspections.

In addition, the PHA has the following goals for the program:

- To assist the local economy by increasing the occupancy rate and the amount of money flowing into the community.
- To encourage self-sufficiency of participant families.

Chapter 3 – Waiting List Administration

The CHA receives federal funding from the U.S. Department of Housing and Urban Development. Per HUD regulations, the CHA maintains a Housing Choice Voucher Program waiting list. This chapter describes HUD requirements and CHA policies for managing its waiting list and applicant selection.

A. Income Targeting – 75 Percent Selection Rule. ([24 CFR §982.201\(b\)\(2\)](#))

Per HUD regulation, not less than 75 percent of HCV program admissions shall be extremely low income, i.e. at or below 30% of the area median income (AMI). This requirement is monitored by fiscal year. The Income Targeting requirement includes new admissions who lease up outside of the CHA's jurisdiction under portability procedures when the voucher is administered. The CHA will ensure compliance with this HUD requirement by maintaining complete program management records.

B. Admissions – Targeted Funding and Waiting List. ([24 CFR §982.203](#))

There are two methods for admission to the HCV program:

1. **Special Admission.** PHAs receive special purpose funding for specified families or categories of families. Such funding shall be provided in accordance with federal, state or local ordinances, rules and regulations. A specific waiting list may be necessary for each special category of applicants. Separate notices, special program rules and information will be made available to the public and to targeted applicants/families.
 - **Non-Elderly Disabled (NED) Vouchers.** The CHA administers 75 NED voucher for households in which the head or spouse is a non-elderly person with disabilities.
 - **Mainstream Vouchers.** The CHA manages 47 Mainstream vouchers from two funding allocations: 38 vouchers through regular funding and nine (9) Mainstream vouchers through CARES Act funding. The vouchers are for families with a non-elderly disabled family member.
2. **Waiting List Admission.** Except for special admissions, applicants shall be selected from the CHA's waiting list. The CHA shall select participants from the waiting list, in accordance with the admission and equal opportunity policies described in this Plan.
 - The CHA designated ten (10) Housing Choice Vouchers for persons experiencing homelessness. If CHA is successful in obtaining grant funds for additional services, the CHA can increase the number of vouchers for homelessness up to ten (10) additional.

C. Local Preferences and Definitions. ([24 CFR §982.207](#))

Public housing agencies are allowed to set local preferences and give those households priority when serving them. Specific local preferences are permitted and subject to constraints by HUD. Additionally, HUD gives the Public Housing Agency discretion to set up other local preferences. The date and time of application serves as the deciding factor for ranking preferences equally.

Special Local Preferences

The CHA has established special local preferences for:

- (1) Displaced by Government Action. A person or family who has been displaced as a result of government action, or whose home has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized under federal disaster relief laws.

This selection preference is rated higher than the following ranking preferences.

Category One

The CHA uses equally weighted local preferences for applicants, with priorities for those who live or work in the City of Carlsbad and are in one or more of the following categories:

- Working Families
- Elderly Families (the Head of household or spouse is 62 years of age or older)
- Disabled Families (at least one household member is disabled.)
- Veterans or surviving spouses of veterans (a veteran with a dishonorable discharge does not qualify for this preference.)
- Homeless- “homeless individual,” “homeless person,” or “homeless family” per HUD’s Definition of Homeless for the Continuum of Care (CoC) Program (previously Shelter Plus Care)

Category Two

Applicants who live or work in the City of Carlsbad, but who do not fit into Category One.

Category Three

Applicants who do not live or work within the City of Carlsbad, but are one or more of the classifications found in Category One.

Category Four

All other applicants not listed above.

Definitions

Carlsbad Residency Preference. The head of household, spouse or co-head lives, works or is hired to work within the city of Carlsbad.

The use of a residency preference will not have the purpose or effect of delaying or otherwise denying admission to the HCV program based on the race, color, religion, ethnic origin, gender, disability or age of any member of an applicant family.

Displaced by Government Action or Natural Disaster. Applicants who reside in the city of Carlsbad who are displaced by government action through no fault of their own or by natural disaster.

Elderly/Disabled Preference. The head of household, spouse or co-head is either 62 years of age or older or a person with disabilities, as defined by HUD.

Homelessness Preference. The head of household, spouse or co-head is a person experiencing homelessness and has provided a [Third-Party Verification of Homeless Status](#) or an [Observation of Homeless Status Form](#) meeting the Department of Housing and Urban Development's documentation requirements.

Veterans Preference. The head of household, spouse or co-head is a veteran of the U.S. Armed Forces who was discharged or released under conditions other than dishonorable), or a surviving spouse of a deceased veteran.

Working Families Preference. The head of household, spouse or sole household member works an average of at least 30 hours per week.

D. Verification of Local Preferences.

1. **Carlsbad Residency Preference.** To verify whether an applicant head of household, their spouse or co-head lives, works or is hired to work within the city of Carlsbad the CHA will accept documents in the applicant's name, such as: a lease agreement, utility bills, employment paystubs/employment letter if hired to work for employment located within the city of Carlsbad or similarly related documents.
2. **Displaced by Government Action or Natural Disaster Preference.** To verify a Displaced by Government Action/Natural Disaster Preference, written documentation, dated within 60 days of voucher issuance, from a government agency is required.
3. **Elderly/Disabled Preference.** To verify an Elderly/Disabled preference, the following documentation/verification will be accepted for the head of household, spouse or co-head:
 - a. **Date of birth** – certificate of birth or naturalization, certificate of U.S. citizenship, a government issued state photo I.D./Driver License, or documentation from the U.S. Citizen and Immigration Services (USCIS).

3. Elderly/Disabled Preference. (continued)

- b. Documentation of person with a disability** – Receipt of Supplemental Security Income (SSI) or verification that the person meets HUD’s definition of disabled.

4. Homeless Preference. To verify a homeless preference, a [Third-Party Verification of Homeless Status](#) or an [Observation of Homeless Status Form](#) meeting the Department of Housing and Urban Development’s documentation requirements is required.**5. Veterans preference.** A Veterans preference will be verified by receipt of an original DD-214 form (Certificate of Release or Discharge from Active Duty). This preference applies to: the head of household, spouse or co-head or the surviving spouse of a deceased veteran of the U.S. Armed Forces who was discharged or released under conditions other than dishonorable.**6. Working Families.**

The Working Families preference will be verified through employment paystubs, letter from employer or IRS tax returns for self-employed applicants.

E. Selection from the Waiting List. ([24 CFR §982.202](#))

The CHA uses a “pre-application” for placement on the HCV waiting list. When pre-applications are received, a confirmation letter will be sent. The confirmation letter will advise applicants of the responsibility to provide written notification of changes which may affect waiting list status, for example, changes in address, income, household composition, etc.

The waiting list order is maintained by local preferences and pre-application date and time. In the event that two or more applicants have identical preferences, the waiting list will be ordered according to pre-application date.

Applicants will be selected from the waiting list in accordance with the CHA’s local preferences and date and time of pre-application. When applicants reach the top of the waiting list and funding becomes available, a full application will be required in order to determine if the applicant appears to be eligible for the HCV program.

An eligibility determination will be made based on the information provided on the HCV Application, the supporting documents submitted and independent verification by the CHA. The applicant must be eligible for claimed preferences, along with HCV program eligibility factors as of the date their application was selected from the waiting list and must remain eligible throughout the Intake process. Applicants determined ineligible for a local preference will be returned to the waiting list.

If the applicant appears to be eligible, an Intake appointment will be scheduled on line or in person. Applicants who are determined eligible for the HCV program will be invited to attend a Voucher briefing as describe in Chapter 6 of this Plan.

Chapter 4 – Program Eligibility

An applicant household is eligible for admission if, within the period of 60 days before voucher issuance, all of the following criteria is met:

A. Eligibility Factors. (see sections B. through G. for specific criteria)

Waiting List Status. CHA staff will verify local preference(s) and eligibility for assistance under HUD’s 75% Selection Rule.
Family Definition. Applicants must meet the CHA’s definition of a “family” and college students require an additional income review. (24 CFR §5.403)
Income Limits. Annual income must be at or below HUD’s established income limits for the family size and program requirements.
Citizenship, Eligible and Ineligible Immigration Status. (24 CFR, Subpart E) Applicants must qualify on the basis of citizenship/eligible immigration status.
Family Obligations and Program Compliance. All family members must comply with the CHA’s Family Obligations and consent to the CHA’s use of information.
Criminal Background Check. All adult members must pass the CHA’s criminal background check.

B. Waiting List Status.

HUD’s 75% Selection Rule. The CHA will ensure that at least 75% of admissions to its HCV program are at or below 30% of the area median income.

Local Preference Verification. The CHA will also document and verify all claimed preferences to ensure proper waiting list selection. The qualification for preference(s) must exist at the time of verification and throughout the intake process, to include through the program admission date.

Chapter 12 – Special Housing Types

A. Special Housing Types - Manufactured Home.

The CHA allows Housing Choice Voucher assistance to be used to provide assistance to a family that owns a manufactured home, but rents the manufactured home space.

B. Other Special Housing Types.

The CHA permits a family to utilize Shared Housing, if it is needed as a reasonable accommodation to make the program readily accessible to and usable by persons with disabilities. The CHA does not allow any other special housing types.

Although the CHA currently only provides Shared Housing as a reasonable accommodation, the agency may take into consideration other housing types, if the rental market is such that there is a limit to available housing in the PHA's jurisdiction.

Project-Based Vouchers. The CHA does not administer Project-Based Voucher and therefore does not have a policy concerning application of Small Area FMRs to project-based voucher units ([24 CFR § 888.113\(h\)](#)).



***City of Carlsbad Housing Agency
PHA Commitment for Partnership***
2024 Continuum of Care Application

09/13/2024

The Carlsbad Housing Agency commits to partner with the Continuum of Care (CoC) by pairing rental assistance for a minimum of 10 households available through the agency's housing resources with CoC-funded supportive services to serve persons who are homeless, or at imminent risk of homelessness.

This commitment is applicable to the Carlsbad RRH Expansion project being submitted to the U.S. Department of Housing and Urban Development (HUD) for funding consideration under the 2024 CoC Notice of Funding Opportunity. The housing resources will be available during the operating period of the projects selected for funding, beginning July 1, 2025.

Currently the Carlsbad Housing Agency serves persons experiencing homelessness as defined by HUD through the Housing Choice Voucher Program with a homelessness preference, the Community Development Block Grant Program, the Continuum of Care Program, and the Homeless Services Division which funds a variety of programs and services. These provisions will apply to the projects selected for funding under the 2024 CoC Notice of Funding Opportunity.

In partnership on behalf of our community,

A handwritten signature in black ink that reads "Chris Shilling".

Chris Shilling
Homeless Services Manager
09/13/2024

1C-7a. PHA MOVING ON PREFERENCE
CONTENTS

CA063- Moving to Work Annual Plan

See highlighted sections for Moving On Program



SAN DIEGO
HOUSING
COMMISSION

Moving Forward Moving To Work Program Annual Plan for Fiscal Year 2024

San Diego Housing Commission
Rental Assistance Division
1122 Broadway, Suite 300
San Diego, CA 92101
www.sdhc.org



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SECTION I – INTRODUCTION AND AGENCY GOALS

MESSAGE FROM THE INTERIM PRESIDENT & CEO

Families with low income or experiencing homelessness in the City of San Diego are at the heart of the work the San Diego Housing Commission (SDHC) performs every day.

SDHC's status as a "Moving to Work" (MTW) agency is essential to our ongoing efforts to provide housing assistance to these families, who need it most in the competitive, high-cost San Diego rental housing market.

With MTW flexibility, we have implemented a variety of initiatives to address housing challenges in the City of San Diego. These initiatives also reflect MTW's statutory objectives: use federal dollars more efficiently; help residents to become more financially self-reliant; and improve housing choices for families with low income.

For example, we created the SDHC Achievement Academy, a learning and resource center with programs that emphasize career planning, job skills, job placement and personal financial education, such as budgeting. With the SDHC Achievement Academy in place, our Path to Success initiative modified the method SDHC uses to determine the portion of the monthly rent that rental assistance participants and public housing residents pay; it also encourages more financial self-reliance.

Many programs of HOUSING FIRST – SAN DIEGO, SDHC's homelessness action plan, also are MTW initiatives. One of these programs, Moving Home rapid rehousing, helps individuals and families experiencing homelessness to obtain and maintain permanent housing through a tailored package of assistance that can include rental assistance and case management. Our Landlord Engagement and Assistance Program (LEAP), another MTW initiative, provides incentives and support for landlords who rent to people who experienced homelessness. LEAP assists other HOUSING FIRST – SAN DIEGO programs, including Moving Home.

For Fiscal Year (FY) 2024 (July 1, 2023 – June 30, 2024), SDHC once again proposes to use MTW flexibility to enhance and create efficiencies in our programs. As rents in the San Diego region continue to increase it is a core focus of SDHC to identify opportunities to achieve fiscal efficiencies so our voucher Payment Standards can remain competitive and our families can continue to have access to quality housing across all areas of the City. This MTW Annual Plan includes details of previous initiatives, as well as our proposals for FY 2024 to update the Path to Success initiative with changes to utility allowances to increase housing choice, by reducing costs in federal expenditures thereby allowing for potential increases in the voucher Payment Standards. Path to Success changes also include an update to the household age designation to align with the Department of Housing and Urban Development current definition of elderly. SDHC is also proposing updates to the Moving Home initiative to expand program eligibility to potentially reach more households in need.

SDHC's motto is, "We're About People." One of our core values as an agency is to serve our clients with equity, dignity and respect.

MTW flexibility allows SDHC to innovate housing solutions for families with low income or experiencing homelessness and build upon our existing initiatives.

As we collaborate with elected leaders, developers, landlords, service providers and a variety of organizations throughout the community, we look forward to the positive impact our MTW initiatives will continue to have in the year ahead.

Sincerely,

Jeff Davis
Interim President and Chief Executive Officer
San Diego Housing Commission





SHORT-TERM AND LONG-TERM MTW GOALS

LONG-TERM GOALS

SDHC STRATEGIC PLAN

The San Diego Housing Commission's (SDHC) [Strategic Plan](#) provides the vision, mission, purpose, core values and strategic priorities that guide SDHC's decisions, initiatives and day-to-day efforts.

The five Strategic Priority Areas identified in the Strategic Plan are:

1. Increasing and Preserving Housing Solutions.
2. Helping Families Increase Opportunities for Self-Sufficiency and Quality of Life
3. Investing in Our Team
4. Advancing Homelessness Solutions – Supporting the City of San Diego Community Action Plan on Homelessness
5. Advocacy, Communication, Public Engagement

COMMUNITY ACTION PLAN ON HOMELESSNESS FOR THE CITY OF SAN DIEGO

City of San Diego Community Action Plan on Homelessness

The [Community Action Plan on Homelessness](#) for the City of San Diego (Community Action Plan) established short-term achievable goals and serves as a guide for long-term success in addressing homelessness. SDHC was one of the lead agencies in the creation of the Community Action Plan, a comprehensive, 10-year plan that the San Diego City Council accepted in October 2019.

The Community Action Plan identified five foundational strategies and a set of principles that guide the work toward meeting the plan's goals. The Five Foundational Strategies are:

- 1. Implement a Systems Level Approach to Homelessness Planning**
Plans are collaborative and leverage city, SDHC, county and regional resources to strengthen programming and ensure the implementation of programs that bridge system gaps.
- 2. Create a Client-Centered Homeless Assistance System**
This involves creating a system that centers around clients and values client input in everything from day-to-day operations to program and policy development.
- 3. Decrease Inflow Through Increase of Prevention and Diversion**
This strategy encourages working with other regional systems to prevent homelessness when possible and divert people at risk of experiencing homelessness from the system altogether.
- 4. Improve the Performance of the Existing System**
Actions include reviewing current practices, performance and metrics to facilitate a move from project- or program-level thinking to system-level thinking.
- 5. Increase the Production of and Access to Permanent Solutions**
This includes identifying low-income and affordable housing options to increase opportunities and provide greater access to permanent housing.

A citywide Leadership Council reviews progress on the action plan and provides direction. The plan also created an Implementation Team of senior staff and a project manager position to keep progress on track. SDHC Interim President & CEO Jeff Davis serves on the Leadership Council. SDHC Executive Vice President of Strategic Initiatives Lisa Jones serves on the Implementation Team. SDHC's Project Manager for the Community Action Plan, Nancy Sa, also serves on the Implementation Team. Policy Liaisons for the Community Action Plan include SDHC Senior Vice President of Policy and Land Use Molly Chase.

In Fiscal Year 2024, the Implementation Team will continue to focus on implementing underlying action items that support the five foundational strategies and work toward meeting the Action Plan goals, including:

- **Develop and Maintain a Coordinated Funding Strategy for Homelessness Services**
At its October 2022 meeting, the Leadership Council received updates on funding priorities and strategies for homelessness services for Fiscal Year 2024 from the County of San Diego Department of Homeless Solutions and Equitable Communities (HSEC), the City of San Diego Homelessness Strategies and Solutions Department (HSSD), SDHC and the Regional Task Force on Homelessness (RTFH). The Leadership Council encouraged the ongoing coordination for upcoming funding opportunities, including a resource mapping effort that would align with an RTFH-led effort to convene a funding strategy



meeting with the principal funding agencies. Through a contract with SDHC, the Corporation for Supportive Housing (CSH), the consultant that helped draft the Community Action Plan, is working with the Implementation Team to conduct an updated review of the crisis response and housing needs in the Community Action Plan.

- **Promote Equity Through Review of Data, Policies, and Practices**

The Regional Task Force on Homelessness (the regions Continuum of Care) Ad Hoc Committee on Addressing Homelessness Among Black San Diegans (Ad Hoc Committee), which explores the factors contributing to disparities among people who are black experiencing homelessness, has developed a series of recommendations to better address the impacts of systemic racism and its effects within the homeless crisis response system.

SHORT-TERM GOALS

EQUITY REVIEW

SDHC's Strategic Plan reflects the agency's commitment to equity and inclusivity. SDHC embraces diverse approaches and points of view to improve its programs, projects and policies. SDHC believes in delivering programs and services in innovative and inclusive ways. SDHC is committed to advancing equity and inclusion both internally and externally.

SDHC continues the process of reviewing the design and implementation of its policies to analyze the impact they may have on underserved and marginalized individuals and groups.

These groups include: race and ethnicity, religious expression, veteran status, nationality (including underrepresented groups and new immigrant populations), people who identify as women, age, socio-economic background, people with apparent or non-apparent disabilities, people of various gender and sexual identities and expressions, American Indians and additional indigenous populations.

This policy review process will provide a structure for institutionalizing the consideration of equity in the process of making, implementing and assessing policy.

SDHC has already reviewed its administrative regulations through this process and plans to review all of the agency's existing and future policies through an equity lens.

DIGITAL INCLUSION

Through its Digital Inclusion Project, which launched in February 2021, SDHC continues to identify opportunities to bridge the "digital divide" between households with access to technology and the internet and those who do not have access.

This "digital divide" adversely affects households with low income and reflects inequities in the abilities of these households to access the internet.

SDHC hosts in-person events at affordable rental housing properties that SDHC owns and/or manages. In collaboration with a variety of providers, these resource events distribute information about digital equity programs and resources available to low-income families, such as no- or low-cost broadband internet service.

SDHC has also entered into a new partnership with the [San Diego Futures Foundation](#) in support of the agency's Digital Equity and Inclusion efforts. SDHC donates retired computers, laptops and tablet devices. Through this partnership, 60 percent of the equipment SDHC donates will be made available at no cost to SDHC clients and the residents of public housing that SDHC operates.

SDHC also has a pilot program in partnership with [San Diego Oasis](#), through which approximately 70 seniors were provided with tablets, broadband access and training.

WORKFORCE DEVELOPMENT: SDHC ACHIEVEMENT ACADEMY

The SDHC Achievement Academy is a learning and resource center with programs that emphasize career planning, job skills, job placement and personal financial education, such as budgeting. Programs are available at no cost to eligible participants. Households with low income in the City of San Diego are eligible to participate in these programs. Many motivated clients have successfully secured employment, increased their earnings or started their own businesses. SDHC's Strategic Plan includes objectives to increase awareness

SECTION I – INTRODUCTION AND AGENCY GOALS



of and participation in SDHC Achievement Academy programs and to establish new partnerships to supplement SDHC Achievement Academy programs by the end of Fiscal Year 2024.

For more information: www.sdhc.org/achievement-academy

WORKFORCE DEVELOPMENT: HOMELESS PROGRAM FOR ENGAGED EDUCATIONAL RESOURCES (PEER)

A first-of-its kind collaboration between SDHC and San Diego City College, the Homelessness PEER course provides specialized education, training and job placement assistance to develop the workforce needed for programs and services that help San Diegans experiencing homelessness. SDHC identified the need for additional qualified applicants for positions in the area of homelessness programs and services. SDHC and the City of San Diego fund Homelessness PEER, while San Diego City College leverages existing San Diego Community College District resources. This program is part of SDHC's ongoing efforts to address workforce and capacity challenges in the homelessness services sector in the City of San Diego.

For more information: www.sdhc.org/homelessness-solutions/peer

HOMEKEY FUNDING: PATH VILLAS EL CERRITO PHASE 1 DEVELOPMENT

On August 24, 2022, the State of California announced its award of \$11.825 million in Homekey program funds for the collaborative development of PATH Villas El Cerrito Phase 1. The development was one of 35 throughout the state that were awarded Project Homekey funds, totaling \$694 million and creating 2,500 new units in 19 communities.

SDHC submitted an application for PATH Villas El Cerrito Phase 1 in collaboration with the County of San Diego and People Assisting the Homeless (PATH) Ventures. The development team includes PATH, PATH Ventures, Family Health Centers of San Diego, and Bold Communities.

The development will create 40 affordable rental apartments for individuals, families and veterans who previously experienced homelessness and one unrestricted manager's unit. The development will be built with prefabricated, container-based housing and will include a ground-floor health clinic operated by Family Health Centers of San Diego.

SDHC committed 40 Project-Based Housing Vouchers to help residents pay their rent, of which five are Veterans Affairs Supportive Housing (VASH) vouchers. Residents would be identified through referrals from San Diego's Coordinated Entry System.

Created during the COVID-19 pandemic, Homekey is a state effort to help "sustain and rapidly expand housing for persons experiencing homelessness or at risk of homelessness, who are especially impacted by COVID-19 and other communicable diseases."

EXPLORING INCREASING DENSITY AT SDHC AFFORDABLE HOUSING PROPERTIES

On October 3, 2022, the San Diego City Council and County of San Diego Board of Supervisors met in a special joint session for a Housing Summit.

They approved a resolution expressing their intent to take joint action to increase the availability of affordable homes in the San Diego region, including efforts to build 10,000 affordable homes on government-owned land and increasing the density of affordable rental properties owned or managed by SDHC and its nonprofit affiliate, Housing Development Partners.

SDHC presented a proposed concept for potentially greater density at its affordable housing properties during the joint City-County meeting. SDHC will work with a land use consultant to evaluate several factors to determine whether additional density is feasible and, if so, at which properties.

SDHC COLLABORATIVE AFFORDABLE HOUSING DEVELOPMENTS

Furthering the goal of increasing and preserving affordable housing, the following SDHC collaborative developments are among approximately 2,628 affordable rental housing units that have received at least preliminary approval from the SDHC Board of Commissioners and are pending completion:

- **Jamboree San Ysidro** (rehabilitation) – 64 permanent supportive housing units for San Diegans with mental disabilities experiencing homelessness
- **Scripps Mesa** (new construction, mixed income) – 53 affordable units for families with low income



- **Courthouse Commons** (new construction, mixed-income) – 41 affordable units for families with low income
- **Ulric Street** (new construction) – 95 affordable units for families with low income
- **Grant Heights II** (rehabilitation, scattered sites) – 41 affordable units for families with low income (formerly Grant Heights and Winona properties)
- **Mercado** (rehabilitation) – 142 affordable units for families with low income
- **The Orchard** (new construction) – 111 affordable units for families with low income (formerly Hilltop & Euclid Family Housing)
- **Ventana al Sur** (new construction) – 100 affordable rental housing units for seniors with low income or experiencing homelessness
- **13th & Broadway** (new construction) – 270 affordable units for individuals and veterans experiencing homelessness and individuals with very low income
- **The Helm** (new construction) – 77 affordable units for families with low income (formerly Front & Beech)
- **Ulric Street Apartments II** (new construction) – 59 affordable units for seniors with low income
- **The Junipers** (new construction) – 80 affordable rental housing units for seniors with low income
- **Tranquility at the Post 310** (new construction, mixed income) – 42 housing units for veterans with low income or experiencing homelessness
- **Aquila Apartments** (new construction) – 180 affordable units for individuals and families with low-income (formerly 3Roots)
- **Bandar Salaam** (rehabilitation) – 67 affordable units for families with low income
- **ShoreLINE** (new construction) – 153 affordable units for families with low income
- **The Iris** (new construction, mixed income) – 99 affordable units for families with low income
- **Nestor Senior Village** (new construction) – 73 affordable rental housing units for seniors experiencing homelessness
- **Levant Senior Cottages** (new construction) – 126 affordable units for low-income seniors
- **Cortez Hill Apartments** (new construction) – 87 affordable units for families with low income, of which 14 units are for families experiencing homelessness
- **Merge 56** (new construction) – 47 affordable units for families with low income
- **Messina Senior Apartments** – (new construction) – 78 affordable units for seniors with low income
- **Navajo Family Apartments** – (new construction) 44 affordable units for families with low income
- **Iris Trolley Apartments** – 63 affordable units for families with low income
- **Tizon Apartments** (acquisition and rehabilitation) – 175 affordable units for seniors with low income (formerly Radisson Hotel Conversion)
- **Rancho Bernardo Transit Village** (new construction) – 99 affordable units for families with low income



SECTION II – GENERAL OPERATING INFORMATION

A. HOUSING STOCK INFORMATION MATRIX

I. PLANNED NEW PUBLIC HOUSING UNITS

New public housing units that the MTW PHA anticipates will be added during the Plan Year.

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# OF UFAS UNITS	
	0/0	2	3	4	5	6+			FULLY ACCESSIBLE	ADAPTABLE
N/A	0	0	0	0	0	0	0	N/A	0	0

TOTAL PUBLIC HOUSING UNITS TO BE ADDED 0

* Select "Population Type" from: Elderly, Disabled, General, Elderly/Disabled, Other

If "Population Type" is "Other" please describe:

N/A

II. PLANNED PUBLIC HOUSING UNITS TO BE REMOVED

Public housing units that the MTW PHA anticipates will be removed during the Plan Year.

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
N/A	0	N/A

0

TOTAL PUBLIC HOUSING UNITS TO BE REMOVED IN THE PLAN YEAR



A. HOUSING STOCK INFORMATION MATRIX

III. PLANNED NEW PROJECT-BASED VOUCHERS

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an AHAP will be in place by the end of the Plan Year.

PROPERTY NAME	NUMBER OF VOUCHERS TO BE PROJECT-BASED	RAD	DESCRIPTION OF PROJECT
CUATRO AT CITY HEIGHTS	48	N/A	LOW INCOME
IRIS AT SAN YSIDRO	25	N/A	LOW INCOME
MT. ETNA SENIOR-PHASE I	8	N/A	LOW INCOME SENIORS
RANCHO BERNARDO TRANSIT VILLAGE	30	N/A	LOW INCOME
BEYER BOULEVARD TROLLEY	30	N/A	LOW INCOME
13TH AND BROADWAY 4%	65	N/A	LOW INCOME AND HOMELESS
13TH AND BROADWAY 4%	40	N/A	HOMELESS
EL CERRITO (HOME KEY)	35	N/A	HOMELESS

281

PLANNED TOTAL VOUCHERS TO BE NEWLY PROJECT-BASED

A. HOUSING STOCK INFORMATION MATRIX (CONT.)

IV. PLANNED EXISTING PROJECT-BASED VOUCHERS

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year.

PROPERTY NAME	NUMBER OF PROJECT-BASED VOUCHERS	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
TAKE WING	8	LEASED/ISSUED	N/A	HOMELESS
HOLLYWOOD PALMS	23	LEASED/ISSUED	N/A	LOW-INCOME
LEAH RESIDENCE	14	LEASED/ISSUED	N/A	HOMELESS
TOWNSPEOPLE	9	LEASED/ISSUED	N/A	HOMELESS
POTIKER	36	LEASED/ISSUED	N/A	LOW-INCOME
ALABAMA MANOR	14	LEASED/ISSUED	N/A	LOW-INCOME
MEADE	10	LEASED/ISSUED	N/A	LOW-INCOME
SANTA MARGARITA	12	LEASED/ISSUED	N/A	LOW-INCOME
THE COURTYARD	3	LEASED/ISSUED	N/A	LOW-INCOME
HOTEL SANDFORD	27	LEASED/ISSUED	N/A	LOW-INCOME
CONNECTIONS HOUSING	73	LEASED/ISSUED	N/A	HOMELESS
MASON HOTEL	16	LEASED/ISSUED	N/A	HOMELESS
PARKER-KIER	22	LEASED/ISSUED	N/A	HOMELESS
CELADON	88	LEASED/ISSUED	N/A	HOMELESS
ALPHA SQUARE	76	LEASED/ISSUED	N/A	HOMELESS
NEW PALACE HOTEL	79	LEASED/ISSUED	N/A	HOMELESS
VILLAGE NORTH SENIOR	44	LEASED/ISSUED	N/A	HOMELESS
ATMOSPHERE	51	LEASED/ISSUED	N/A	HOMELESS
TALMADGE GATEWAY	59	LEASED/ISSUED	N/A	HOMELESS
CYPRESS APARTMENTS	62	LEASED/ISSUED	N/A	HOMELESS
NORTH PARK SENIOR	8	LEASED/ISSUED	N/A	HOMELESS
QUALITY INN	91	LEASED/ISSUED	N/A	HOMELESS
WEST PARK	46	LEASED/ISSUED	N/A	HOMELESS
ALPHA LOFTS	52	LEASED/ISSUED	N/A	HOMELESS
ZEPHYR	84	LEASED/ISSUED	N/A	HOMELESS
VISTA DEL PUENTE	38	LEASED/ISSUED	N/A	HOMELESS
THE BEACON	43	LEASED/ISSUED	N/A	HOMELESS
STELLA	62	LEASED/ISSUED	N/A	HOMELESS
THE LINK	72	LEASED/ISSUED	N/A	HOMELESS
SAN YSIDRO SENIOR	50	LEASED/ISSUED	N/A	HOMELESS
BENSON PLACE	82	LEASED/ISSUED	N/A	HOMELESS
IVY APARTMENTS	52	LEASED/ISSUED	N/A	HOMELESS
TRINITY PLACE	73	LEASED/ISSUED	N/A	HOMELESS

SECTION II – GENERAL OPERATING INFORMATION



14TH & COMMERCIAL	254	LEASED/ISSUED	N/A	HOMELESS
THE HELM (FRONT AND BEECH)	32	LEASED/ISSUED	N/A	HOMELESS
THE ORCHARD AT HILLTOP	25	LEASED/ISSUED	N/A	LOW-INCOME
JAMBOREE-SAN YSIDRO	64	LEASED/ISSUED	N/A	LOW-INCOME
VALLEY VISTA	190	LEASED/ISSUED	N/A	HOMELESS
KEARNY VISTA	142	LEASED/ISSUED	N/A	HOMELESS
HILLCREST INN	12	LEASED/ISSUED	N/A	HOMELESS
SHORELINE (GRANTVILLE)	25	LEASED/ISSUED	N/A	LOW-INCOME
TIZON	44	LEASED/ISSUED	N/A	LOW-INCOME
NESTOR SENIOR VILLAGE	73	LEASED/ISSUED	N/A	LOW-INCOME
ULRIC II	59	LEASED/ISSUED	N/A	LOW-INCOME
LEVANT SENIOR COTTAGES	70	LEASED/ISSUED	N/A	LOW-INCOME
HACIENDA TOWNHOMES	19	LEASED/ISSUED	N/A	LOW-INCOME
SORRENTO TOWER	17	LEASED/ISSUED	N/A	LOW-INCOME
ADU PILOT	5	LEASED/ISSUED	N/A	LOW-INCOME
TRANQUILITY AT THE POST 310	10	LEASED/ISSUED	N/A	HOMELESS
VENTANA AL SUR	25	LEASED/ISSUED	N/A	HOMELESS
SOUTHWEST VILLAGE	50	LEASED/ISSUED	N/A	LOW-INCOME AND HOMELESS
CORTEZ HILL APARTMENTS	87	LEASED/ISSUED	N/A	LOW-INCOME AND HOMELESS
NAVAJO FAMILY APARTMENTS	8	LEASED/ISSUED	N/A	LOW-INCOME

2,690

PLANNED TOTAL EXISTING PROJECT-BASED VOUCHERS

** Select "Planned Status at the End of Plan Year" from: Committed, Leased/Issued*



A. HOUSING STOCK INFORMATION MATRIX

V. PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR

Examples of the types of other changes can include (but are not limited to): Units held off-line due to relocation or substantial rehabilitation, local non-traditional units to be acquired/developed, etcetera.

No changes anticipated.

VI. GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

SDHC anticipates Capital Fund Program formula funds will be used to fund the soft costs, the hard costs and administrative costs of various renovation activities throughout the (8) Public Housing properties consisting of (189) public housing units. Hard costs may include upgrades to property fencing, parking lot seal and stripe, security camera and safety improvements, limited stair upgrades, exterior area and building lighting, limited electrical, and limited site improvements. Soft costs may include architecture and engineering and third-party consultants for due diligence related activities. The property and scope selection are to be determined.

SDHC also anticipates MTW funds will be used to fund capital expenditure costs of various renovation activities in Project Based Voucher and Local, Non-Traditional units. Costs may include energy efficiency measures, upgrades to plumbing and other critical needs projects.



B. LEASING INFORMATION MATRIX

I. PLANNED NUMBER OF HOUSEHOLDS SERVED

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	2,268	189
MTW Housing Choice Vouchers Utilized	171,204	14,267
Local, Non-Traditional: Tenant-Based^	14,316	1,193
Local, Non-Traditional: Property-Based^	13,056	1,088
Local, Non-Traditional: Homeownership^	240	20
PLANNED TOTAL HOUSEHOLDS SERVED	201,084	16,757

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Sponsor-Based Subsidy Program / 2011-8	10,992	916
Tenant-Based	Transitional Project-Based Subsidy Program / 2013-6	564	47
Tenant-Based	Monarch Housing Program / 2016-1	300	25
Tenant-Based	Guardian Scholars Program / 2016-2	1,080	90
Tenant-Based	Moving On Program / 2017-1	480	40
Tenant-Based	Moving Home Program / 2018-1	900	75
Property-Based	Affordable Housing Development / 2011-4	12,444	1,037
Property-Based	Preservation of Affordable Housing in the City of San Diego / 2021-2	612	51
Homeownership	Homeownership Program / 2022-1	240	20
PLANNED/ACTUAL TOTALS		27,612	2,301

* The sum of the figures provided should match the totals provided for each local, non-traditional categories in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

II. DISCUSSION OF ANY ANTICIPATED ISSUES / POSSIBLE SOLUTIONS RELATED TO LEASING

Discussion of any anticipated issues and solutions utilized in the MTW housing program listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Public Housing	N/A
MTW Housing Choice Voucher	N/A
Local, Non-Traditional	N/A



C. WAITING LIST INFORMATION MATRIX

I. WAITING LIST INFORMATION ANTICIPATED

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED
Housing Choice Voucher: Tenant-Based	Community Wide	134,377	Open
Housing Choice Voucher: Project-Based	Site-Based	75,193	Open
Housing Choice Voucher: Project-Based (Single)	Site-Based	17	Closed
Public Housing	Community Wide	103,901	Open
Local Non-Traditional	Community Wide	N/A	N/A

Please describe any duplication of applicants across waiting lists:

Applicants have the opportunity to apply to multiple rental assistance programs and often appear on multiple wait lists. Local Non-Traditional programs utilized the Coordinated Entry System (CES) for waitlist purposes.

II. PLANNED CHANGES TO WAITING LIST IN THE PLAN YEAR

Please describe any anticipated changes to the organizational structure or policies of the waiting lists(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
Housing Choice Voucher: Tenant-Based	Anticipate waitlist number to decrease due to refresh occurring in FY 2023.
Housing Choice Voucher: Project-Based	Anticipate waitlist number to decrease due to refresh occurring in FY 2023.
Housing Choice Voucher: Project-Based (Single)	Anticipate waitlist number to decrease due to refresh occurring in FY 2023.
Public Housing	Anticipate waitlist number to decrease due to refresh occurring in FY 2023.
Local Non-Traditional	None



SECTION III – PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED

2012-1. PATH TO SUCCESS (RE-PROPOSED)

Activity Description

Path to Success is a comprehensive rent reform measure designed to motivate and benefit Work-Able rental assistance participants while remaining impact neutral to Elderly/Disabled households. The Tiered Rent Table component of the activity both incentivizes and rewards Work-Able households for increasing income by using the lower edge of an annual income range when calculating the rent portion instead of actual income. The activity also institutes progressive minimum rents for Work-Able households, thus requiring certain households to increase annual income amounts to meet the applicable minimum rent threshold. Path to Success was initially proposed in the Fiscal Year 2012 MTW Annual Plan, re-proposed in the Fiscal year 2012 MTW Annual Plan to restructure the rent reform model, re-proposed again in the Fiscal Year 2014 MTW Annual Plan to include a local portability policy, and re-proposed again in the Fiscal Year 2019 MTW Annual Plan to adjust the minimum rents used for Work-Able rent calculations.

This re-proposal of the initiative in Fiscal Year 2024 modifies the rent reform model further by adjusting household age designation. All other facets of the initiative remain constant.

Elderly/Disabled Rent Reform Model

As part of Path to Success, the Elderly/Disabled population includes families where 100 percent of adults are either 55 years of age, disabled, or a full-time student ages 18 to 23. SDHC proposes that this definition be revised to include Elderly/Disabled population families where 100 percent of adults are either 62 years of age, disabled, or a full-time student ages 18 to 23. This will align with HUD's defined age of an elderly person. There would be no immediate impact to households. Households who are currently 55 to 62 years old and in the Elderly/Disabled population will remain in the Elderly/Disabled population and Work-Able households will remain a Work-Able household until they meet the revised definition of Elderly.

In a national report by the U.S. Bureau of Labor Statistics, there has been a 22 percent increase between 2012 and 2022 in employment for individuals 55 years and over. An increasing number of households who are 55 years of age or older are still Work-Able, and this modification to the definition of elderly household to align with the current HUD definition will encourage continued employment for those households.

Statutory Objectives

The activity will achieve the statutory objective to reduce cost and achieve greater cost effectiveness in Federal expenditures and encourage self-sufficiency of Work-Able households.

Anticipated Impacts

. This re-proposed activity will encourage self-sufficiency of Work-Able households by aligning the age for elderly households with HUD's defined age of an elderly person.

SDHC anticipates long-term cost savings related to the measures contained in the proposed Path to Success model. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding. However, SDHC projection modeling identified a decrease in Housing Assistance Payments (HAP) in the first two years of implementation when not taking into account other factors that impact monthly HAP costs including fluctuations in housing income, increases in payment standards, inflation, and HUD funding levels.

Anticipated Timeline to Achieve Objectives

The revision of the definition of elderly households will begin for all existing and new households beginning July 1, 2024. SDHC will notify all households of the change in definition of elderly as soon as the MTW Plan is approved, and will continue to notify households for a minimum of one year.

The Achievement Academy will continue to provide all necessary services to ensure success.



Activity Metrics Information

METRIC	BASELINE	BENCHMARK	OUTCOME
CE #1: Agency Cost Savings <i>Total cost of task in dollars (decrease).</i>	\$1,586,149	\$1,268,919	
CE #2: Staff Time Savings <i>Total time to complete the task in staff hours (decrease).</i>	15,733	12,136	
CE #3: Decrease in Error Rate of Task Execution <i>Average error rate in completing a task as a percentage (decrease).</i>	17%	15%	
CE #5: Increase in Agency Rental Revenue <i>Total household contributions towards housing assistance (increase)</i>	\$47,360,952	\$52,097,047	
SS #1: Increase in Household Income <i>Average earned income of households affected by this policy in dollars (increase).</i>	\$18,586	\$20,445	
SS #3: Increase in Positive Outcomes in Employment Status <i>(1) Employed Full-Time</i> <i>(2) Employed Part-Time</i> <i>(3) Enrolled in an Educational Program</i> <i>(4) Enrolled in Job Training Program</i>	50 29 16 32	63 36 20 40	
SS #6: Reducing Per Unit Subsidy Costs for Participating Households <i>Average amount of Section 8 and/or Section 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).</i>	\$1,107	\$996	
SS #8: Households Transitioned to Self Sufficiency <i>Number of households transitioned to self-sufficiency (increase). *</i> <i>*For purposes of the metric, self-sufficiency is defined as exiting a rental assistance program due to \$0 assistance rendered or voluntary surrender of assistance.</i>	0	120	

Projected Outcomes

- CE #1: The baseline and benchmark have been updated to reflect the current HUD administrative reimbursement rate.
- CE #2: There are no anticipated changes to this metric.
- CE #3: There are no anticipated changes to this metric.
- CE #5: The total household contributions toward assistance may increase slightly due to the revision to the age of elderly households.
- SS #1: There are no anticipated changes to household income.
- SS #3: There may be a slight increase in employment status due to the revision to the age of elderly households.
- SS #6: The baseline and benchmark for per unit subsidy costs for participating households has been updated to reflect the current average HAP for MTW households.
- SS #8: There are no anticipated changes to this metric.

Description of Data Sources for Metrics

Reports will be created in the housing management software to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis.

Cost Implications

SDHC anticipates long-term cost savings related to the measures contained in the proposed Path to Success model. The long-term cost savings cannot be definitively predicted due to fluctuations in household income, changes in payment standard amounts, inflation, and HUD funding levels and all factors associated with agency funding. However, SDHC can predict a Housing Assistance Payments

SECTION III – PROPOSED MTW ACTIVITIES: HUD APPROVAL REQUESTED



(HAP) decrease in the first two years of implementation, when not taking into account other factors that impact monthly HAP costs including fluctuations in housing income, increases in payment standards, inflation, and HUD funding levels.

Need/Justification for MTW Flexibility

MTW Agreement Attachment C, Section B (3) containing waivers of Section 3 (b)(3) and (G) of the 1937 Act and 24 C.F.R. 5.403; Section C(11) containing waivers of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R. 5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A; Section D(1) containing waivers of Section 8(o)(7) of the 1937 Act and 24 C.F.R. 982.162; Section D(2)(a) containing waivers of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H)-(I) of the 1937 Act and 24 C.F.R. 982.508, 982.503 and 982.518; Section D(2)(c) containing waivers of Section 8(o)(10) of the 1937 Act and 24 C.F.R. 982.507;

Rent Reform/Term Limit Information (if applicable)

Impact Analysis

Elderly/Disabled Rent Reform

There would be no immediate impact to households. Households who are currently 55 to 62 years old and in the Elderly/Disabled population will remain in the Elderly/Disabled population. There will be no immediate change in rent as a result of this change because Elderly/Disabled households will remain an Elderly/Disabled household, and Work-Able households will remain a Work-Able household until they meet the revised definition of Elderly.

The impact analysis reviews current households who are between 50 and 54 years old who are Work-Able, and what their change in rent portion would be at the Elderly/Disabled Total Tenant Payment calculation. There would be no immediate impact to the participating households in this cohort, as their tenant portion calculation would remain the same. Once the population meets the revised definition of elderly household (to 62 years old), the analysis shows that 61 percent of households in this cohort would experience a decrease in their rent portion, and 39 percent would experience an increase in their rent portion.

Impact Analysis					
Impact to Rent Portion for Work-Able Households Between 50 and 54 Years Old					
Decrease in Rent Portion				Increase in Rent Portion	
\$1 - \$50	\$51 - \$100	\$101 - \$150	> \$150	\$1 - \$50	\$51 - \$88
25%	7%	5%	23%	26%	13%

Path to Success Hardship Policies

SDHC constructed hardship policies for subpopulations identified as requiring consideration of their respective situations which may prohibit growing income to match the Path to Success requirement to pay a higher rent portion over time to encourage self-sufficiency. The hardship policies will be applied on a case-by-case basis. The appropriate language surrounding the hardship policy is contained in the Administrative Plan, and procedures have been drafted to ensure consistent application of the hardship policies.

SDHC recognizes instituting progressive minimum rents may impact some families to a greater degree than others. Hardship policies were developed and implemented to ensure fragile households are able to navigate the minimum rents effectively.

SDHC appointed an internal Hardship Review Committee which reviews and makes determinations on all hardship requests. Hardship exemptions are temporary. During the hardship exemption period, the family's monthly rent portion is reduced to an acceptable rent burden percentage: 45 percent of adjusted monthly income for Work-Able families and 40 percent for Elderly/Disabled families. All families approved for the hardship exemption are referred to a Work Readiness Specialist (WRS) to receive supportive services. The purpose of the WRS is to assist the families in regaining employment by engaging in a rigorous individualized service plan. The Hardship Rent Table will be used in the application of the hardship rent portion for the duration of the exemption.



Hardship Rent Table	
Annual Income	Hardship Rent
\$0 - \$4,999	\$0
\$5,000 - \$9,999	\$125
\$10,000 - \$14,999	\$250
\$15,000 - \$19,999	\$375

Zero Income: Any family whose income is reduced to zero will have a zero rent portion if the loss is through no fault of their own. The exemption will have a duration of six months maximum after which time their rent portion will default to the applicable minimum rent. Work-Able zero income families will be required to sign a document consenting to participate in required self-sufficiency activities, which may include attending work-readiness classes/workshops, applying for benefits, regaining employment, etcetera. The families will be referred to the Achievement Academy to work closely with a Work Readiness Specialist (WRS) during the temporary hardship exemption. At the point the exemption ceases, the family will be responsible to pay a rent portion calculated using Path to Success methodology.

Minimum Rent: The family, whether Work-Able or Elderly/Disabled, must request a hardship exemption in writing. Requirements for consideration are as follows:

- Family's shelter burden must be greater than the acceptable level as calculated by SDHC.
- The family must either be Elderly/Disabled or consist of a single Work-Able adult with one or more dependents.
- Gross income before exclusions is considered.
- Family must sign a document consenting to participate in Achievement Academy work-readiness services.

Fragile Households: SDHC will consider special situations on a case-by-case basis for admission to the Elderly/Disabled population. The Hardship Review Committee will make a recommendation to a Senior Leadership representative in Rental Assistance, or a designated alternate staff member, who will have final approval in such extraordinary circumstances.

2018-1. MOVING HOME: A RAPID REHOUSING PROGRAM (RE-PROPOSED)

Activity Description

SDHC is re-proposing its Moving Home program, a local rapid rehousing program, which utilizes MTW funds to provide housing subsidies to individuals and households experiencing homelessness while supportive services are provided to strengthen stabilization. The current Moving Home program is modeled after traditional rapid rehousing programs and has been a successful component of San Diego's homelessness response system. Building on the success of Rapid Rehousing both as a national model and within our local program, SDHC proposes to expand Moving Home to encompass a rapid stabilization component for individuals and households who are experiencing significant housing instability and are considered highly or especially vulnerable should they lose their housing. At a national level the United States Interagency Council on Homelessness (USICH) has begun to focus its attention on the critical need to reduce inflow into the homelessness response system and elevate the need for [upstream prevention](#). SDHC has been a leader locally on prevention efforts since launching its locally funded programs in 2017 for households at imminent risk of homelessness. SDHC strongly supports this recent national shift towards upstream prevention and not solely 'fail first' programming that requires households (regardless of their level of vulnerability) to become literally homeless before higher level intervention resources such as rapid rehousing rental assistance and supportive services can be accessed. The National Alliance to Address Homelessness has recommendations for objective assessments to identify the level of vulnerability of households with high needs. A program that can narrowly target those highly vulnerable households with stabilization resources before they experience the damaging crisis of literal homelessness will reduce inflow to the homeless response system, mitigate the damaging health effects of homelessness on highly vulnerable sub-populations and quickly stabilize households. This expansion of Moving Home would utilize the same principles and best practices of Rapid Rehousing programs, providing rental assistance and supportive services tailored to meet the household needs, only providing the support necessary to stabilize the household, providing rental assistance that can be adjusted over time with a goal of exiting the stabilized household to a permanent sustainable housing situation.

This Moving Home expansion component could be implemented as a three-year pilot which would provide services such as housing relocation support (when finding a more affordable unit is necessary), stabilization services, and rental assistance to individuals and households who have been identified through referrals from 211, under a formal Memorandum of Understanding, and through

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SDHC's Housing First San Diego Hotline. Both referral mechanisms are existing, well-established avenues for households in housing crisis to access SDHC's existing prevention and diversion programs.

Moving Home's rapid rehousing component will continue to serve individual and households residing on the street, or in an emergency shelter. The program will also continue to provide short-term transitional subsidies for individuals transitioning from other federally funded rapid re-housing programs to ensure stability during the transition.

SDHC seeks to use broader uses of funding authority to provide the financial support for subsidy and program related expenses. Along with the existing rapid rehousing program, SDHC anticipates it could provide up to \$3 million of MTW funds annually to financially support the expanded component of the Moving Home program, consisting of rental assistance, support services, and administration. In addition to the households served annually through the rapid rehousing component of the Moving Home program, SDHC anticipates providing housing to approximately 150 to 250 households annually through its pilot stabilization component. The number served and budget may increase based on increases in the local rental market or if the local program is determined successful.

The Moving Home rapid rehousing and rapid stabilization program(s) also ensure an array of resources are available to individuals and households to stabilize and maintain housing while working towards financial independence. SDHC staff will provide support services such as:

- Housing search
- Tenant counseling
- Build basic tenancy skills, including understanding lease requirements, and helping arrange utilities
- Making moving arrangements, including providing financial assistance for moving costs and move-in kits
- Mediation with property owners and landlords
- Developing, securing and coordinating services
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Access to SDHC's Achievement Academy services

The housing subsidy combined with supportive services ensures program participants have adequate time to stabilize and achieve self-sufficiency. By assisting individuals and households to rapidly stabilize in permanent housing, Moving Homes rapid rehousing and rapid stabilization components will reduce the number of San Diegans experiencing literal homelessness and the length of time San Diegans remain in homeless shelters. This will increase the availability of beds for other persons experiencing homelessness requiring immediate shelter, while also reducing the public and personal costs of homelessness.

Program Duration and Subsidy Calculation Methodology: The Moving Home program(s) will be two-year program(s) with the option of a one-year extension, granted as a safety net for participants requiring additional time to stabilize. The initial subsidy will be determined at program entry, re-determined within the first 90 days, and then recertified annually until the conclusion of program participation. Subsidies will not exceed SDHC's published payments standards. The minimum rent at program entry will be \$0. Income will be verified using a verification of income form and will require third-party documentation as part of the verification process. The methodology for subsidy determination is based on proven best practices among nationwide rapid rehousing programs and allows households stability as they strive to increase earned and or benefit income amounts and/or reduce other expenses through home sharing, family reunification, accessing long term affordable housing or other similar opportunities. The subsidy determination will consider local factors such as the cost of housing in San Diego as well as standards utilized by similar programs currently operating in the community.

The proposed methodology to determine the subsidy uses a graduated rent structure. During the first 90 days of the program, SDHC will pay a percentage of the participant's contract rent, based on household need and income at program entry (up to 100 percent in some circumstances). After 90 days of program participation, SDHC will reevaluate the participant's annual income and progress made towards achieving stability and economic self-sufficiency. If income levels increase to a level supporting a decrease in subsidy provided by SDHC, the percentage of the contract rent paid by SDHC will be reviewed and reduced. This methodology will continue until the participant is determined to be able to support the majority of the contract rent without being significantly rent burdened. At this point, the participant will transition from the program. Please note: The intervals of reevaluating a participant's income as well as the percent of contract rent paid are approximate. SDHC anticipates adjusting the model according to the individualized service plans of program participants as well as lessons learned during the pilot time of the expansion component. Although the

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MTW rapid re-housing and rapid stabilization models are informed by national best practice, it is anticipated that local needs may result in modification of the national model to more efficiently and effectively serve local constituents.

Administration: SDHC will maintain the administrative functions for determining initial and on-going programmatic eligibility. SDHC will document the participant's income levels upon admission into the program and certify income levels and household circumstances annually using a streamlined process.

For purposes of initial eligibility, criminal history will not be reviewed with the exception of sex offender status and arrests/convictions resulting from manufacturing methamphetamine in federally assisted housing. Federal and/or state registration as a sex offender and/or involvement with the aforementioned methamphetamine activities will preclude individuals from participating in the program.

Participants will be required to apply to the HCV tenant-based waitlist upon program admission. Participants will not automatically become eligible for a tenant-based voucher upon termination of program participation and must proceed through the waitlist process to obtain a tenant-based voucher.

SDHC will also provide the supportive services as described in the preceding paragraph. Participant data will be stored in SDHC's housing management software and the local Housing Management Information Systems (HMIS) to ensure both outputs and outcomes are captured accurately.

HQS Inspections: for new move-ins, inspections will be conducted at program admission and annually thereafter. Initial inspections will be conducted if the family moves to another unit. All SDHC HQS guidelines apply to the program. For the expanded stabilization pilot, habitability inspections would be utilized.

Waitlist: For the rapid rehousing component, San Diego's Coordinated Entry System (CES) will continue to be utilized in lieu of a waitlist, homeless individuals and families who have been evaluated by the CES standardized vulnerability assessment tool as best served by the rapid rehousing model will be served. For Moving Homes rapid stabilization pilot, referrals would be received from 211 and through SDHC's Housing First San Diego Hotline. If specific populations were to be targeted (example; justice involved) other referring mechanisms may be implemented. Program admissions will be prioritized according to local standards (utilizing the current Community Prioritization for Homelessness), level of acuity, and overall vulnerability determined via the appropriate assessment tools.

Statutory Objectives

The activity will achieve the statutory objective of increasing housing choice to low-income families since the activity results in additional housing resources within the City of San Diego.

Anticipated Impacts

The anticipated impact of the initiative will be creating another mechanism to serve highly vulnerable households and homeless residents of San Diego with a local approach. Under the initiative, an increased number of housing resources will be available to prevent and end homelessness. Additionally, SDHC expects to increase self-sufficiency and reduce the recidivism of program participants by helping participants to obtain employment and increase income amounts to achieve financial stability.

Anticipated Timeline to Achieve Objectives

SDHC will implement the program effective July 1, 2017 and expects to achieve all benchmarks at the conclusion of the three-year pilot era.

Activity Metrics Information

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METRIC	BASELINE	BENCHMARK	OUTCOME
CE #1: Agency Cost Savings <i>Total cost of task in dollars (decrease).</i>	\$1,001,130	\$800,904	
CE #2: Staff Time Savings <i>Total time to complete the task in staff hours (decrease).</i>	7,800	6,240	
CE #3: Decrease in Error Rate of Task Execution <i>Average error rate in completing a task as a percentage (decrease).</i>	17%	4%	
CE #5: Increase in Agency Rental Revenue <i>Total household contributions towards housing assistance (increase)</i>	\$0	\$62,400	
SS #1: Increase in Household Income <i>Average earned income of households affected by this policy in dollars (increase).</i>	\$0	\$10,000	
SS #3: Increase in Positive Outcomes in Employment Status (1) Employed Full-Time (2) Employed Part-Time (3) Enrolled in an Educational Program (4) Enrolled in Job Training Program	22 7 8 4	38 56 6 18	
SS #4: Households Removed from Temporary Assistance for Needy Families (TANF) <i>Number of households receiving TANF assistance (decrease)</i>	18	5	
SS #5: Households Assisted by Services that Increase Self Sufficiency <i>Number of households receiving services aimed to increase self-sufficiency (increase)</i>	\$0	\$50	
SS #6: Reducing Per Unit Subsidy Costs for Participating Households <i>Average amount of Section 8 and/or Section 9 subsidy (or local, non-traditional subsidy) per household affected by this policy in dollars (decrease).</i>	\$1,288	\$1,159	
SS #7: Increase in Agency Rental Revenue <i>Total household contributions toward housing assistance (increase)</i>	\$0	\$88,934	
SS #8: Households Transitioned to Self Sufficiency <i>Number of households transitioned to self-sufficiency (increase).*</i> <i>*For purposes of the metric, self-sufficiency is defined as exiting a rental assistance program due to \$0 assistance rendered or voluntary surrender of assistance.</i>	0	96	

Projected Outcomes

- CE #1: Moving Home will generate administrative savings related to the cost of staff hours required to administer the program. The baseline and benchmark for CE #1 have been updated to reflect the current HUD administrative reimbursement rate.
- CE #2: Fewer staff hours are required to administer Moving Home than a traditional voucher program, thus resulting in a decrease of staff hours.
- CE #3: The simplified subsidy calculation will result in decreased payment error.
- CE #5: Increases in rental revenue result from the programmatic costs savings generated by the reduction in staff hours required to administer the streamlined program.
- SS #1: At least 20% of households will increase annual earned income amounts as a result of services offered via the Achievement Academy and other partnerships.
- SS #3: At least 65% of households will obtain employment or be connected to eligible benefits to ensure housing stability upon program exit.
- SS #4: SDHC anticipated services providing in the Moving Home program will increase employment opportunity, thus resulting in decreased reliance on TANF.
- SS #5: An increased number of households will receive services to increase self-sufficiency under the Moving Home program.
- SS #6: The subsidy calculation will reduce the average subsidy costs for the provision of rental assistance for program participants. The baseline and benchmark for per unit subsidy costs for participating households has been updated to reflect the current average HAP for Moving Home households.
- SS #7: Rental revenue will increase proportional to the decrease in average subsidy costs.
- SS #8: At least 80% of households will transition into permanent housing upon program exit.

Description of Data Sources for Metrics

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Reports will be created in the housing management software and HMIS to retrieve data related to the metrics and imported into an Excel spreadsheet for further analysis. Data will be analyzed on an annual basis and summarized in dashboard format.

Cost Implications

The budget for the proposed pilot expansion is anticipated to be up to \$3,000,000 annually for the first two years, decreasing in year three.

Need/Justification for MTW Flexibility

Attachment C, B.1. Single Budget with Full Flexibility - Broader Uses of Funds Authority amendment. SDHC will adhere to all requirements set forth in PIH Notice 2011-45.

Broader Uses of Funds Authority enables SDHC to create a local, non-traditional tenant-based rental assistance program.

Rent Reform/Term Limit Information (if applicable)

N/A



SECTION IV – APPROVED MTW ACTIVITIES

IMPLEMENTED ACTIVITIES

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IMPLEMENTED ACTIVITIES

2022-1.

HOMEOWNERSHIP PROGRAM

PLAN YEAR APPROVED: 2022

RE-PROPOSED: N/A

DESCRIPTION

Using Broader Use of Funds Authority, SDHC allocated up to \$5 million towards the existing first-time homebuyer's programs, which should assist around 50 families under 80% AMI in being able to purchase a home in the City of San Diego. Currently, SDHC receives funding for its homeownership programs via HOME, Community Development Block Grants (CDBG), California CalHome Program funds, and the City of San Diego Affordable Housing Fund.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2021-2.

PRESERVATION OF AFFORDABLE HOUSING IN THE CITY OF SAN DIEGO

PLAN YEAR APPROVED: 2021

RE-PROPOSED: N/A

DESCRIPTION

SDHC created a Local Non-Traditional, Property-Based activity to provide financing for the preservation and rehabilitation of properties that are not owned by SDHC. In seeking funding for preservation or rehabilitation, landlords will be incentivized to maintain the affordability of the units and improve housing stock as they provide safe, decent and sanitary dwelling units.

SDHC is committed to preserving affordable housing within the City of San Diego, by developing methods of financing to incentivize property owners to preserve their existing affordable housing units. Financing received through SDHC will help these property owners complete necessary health and safety upgrades to dwelling units that could normally be cost-prohibitive, leading to an increase in rent for tenants. In receiving this funding, this ensures that properties receiving SDHC funds remain affordable to low-income families for the foreseeable future.

During FY 2021 and FY 2022, NOFAs were developed aimed at the preservation of deed-restricted and naturally occurring affordable housing (NOAH).

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2021-1.

ESTABLISHMENT OF ALTERNATIVE REASONABLE COST LIMITS

PLAN YEAR APPROVED: 2021

RE-PROPOSED: N/A

DESCRIPTION

SDHC received permission to develop alternative reasonable cost limits to include Total Development Costs (TDC) and Hard Construction Costs (HCC) for the amount of Moving to Work funds that can be contributed in SDHC's local non-traditional development and rehabilitation activities. Over the past several years, the San Diego metropolitan area has seen massive increases in the cost to develop and rehabilitate new and existing properties.

SDHC has seen multiple projects exceed HUD-published limits for the San Diego region, as the Rental Housing Finance Division is a lender, conduit bond issuer, and administrator of the City of San Diego's affordable land use programs including the Inclusionary, Density Bonus, Single-Room Occupancy, and Coastal Replacement Housing ordinances. Using the alternative reasonable cost formula, SDHC was able to increase its ability to ensure that more affordable units are developed or rehabilitated within the City of San Diego.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2020-1. LANDLORD RETENTION AND INCENTIVE PROGRAM

PLAN YEAR APPROVED: 2020

RE-PROPOSED: N/A

DESCRIPTION

The Landlord Partnership Program (LPP) aims to expand rental opportunities for families holding housing choice vouchers by making landlord participation in the program more attractive by providing both financial and supporting incentives to landlords who rent to HCV Program participants within the City of San Diego.

Incentives are designed to recruit new landlords and units as well as retain existing units within the portfolio of available housing.

Prior Updates

- FY 2023: Landlord Partnership Assurance Fund: For damages caused by tenant beyond normal wear and tear or failure to pay rent, landlords may request assurance funds to cover expenses that exceed security deposits. Landlords can access assurance funds only within first two years of new tenancy. SDHC will establish a maximum permissible award per tenancy. The maximum will be determined by SDHC using the local market averages and may be adjusted for inflation, the proposed budget for this fund is \$250K.
- FY 2022: SDHC included other eligible expenses related to the leasing of units and recruitment/retention of HCV owners to facilitate the successful leasing and use of housing vouchers by families. This may include, but not be limited to, application fees, processing fees, holding deposits, landlord recruitment and incentive payments, such as unit hold payments, to assist families with various up-front costs for leasing units in an expedited manner.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2018-1. MOVING HOME: A RAPID REHOUSING PROGRAM

PLAN YEAR APPROVED: 2018

RE-PROPOSED: 2024

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC created rapid re-housing program to provide housing subsidy to families at-risk of homelessness. Subsidies are provided to the families while receiving services to ensure housing stability while gaining financial independence.

Prior Updates

- FY 2020: The program budget was increased to \$5 million in a technical amendment approved in April 2020 due to COVID-19.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: Moving Home has been re-proposed in the FY 2024 MTW Annual Plan to include a rapid stabilization component.

2017-1. THE MOVING ON PROGRAM

PLAN YEAR APPROVED: 2017

RE-PROPOSED: N/A

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC created a pilot program to provide housing subsidy to formerly homeless individuals and families no longer requiring a permanent supportive housing solution to sustain housing stability.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2016-3. HOMELESS SHELTER BEDS

PLAN YEAR APPROVED: 2016

RE-PROPOSED: N/A

DESCRIPTION

In FY 2016, SDHC received approval under Broader Uses of Funds Authority to subsidize shelter beds in the City of San Diego. Shelter programs serve a variety of needs and subpopulations. SDHC and regional partners have identified, similar to housing interventions, that a continua of options is needed to engage certain sub-populations, especially those that are historically hesitant to enter traditional congregate shelter. This approach aligns with the goals and practices set forth in the Community Action Plan on Homelessness for the City of San Diego. All contracted programs are required to follow Housing First principles with low barriers to entry and align with regional Continuum of Care community standards and national best practices as detailed in contracted scopes of work. In alignment with national best practice to provide low-barrier shelter access, only criminal history related to life-time sex offender status and convictions resulting from manufacturing methamphetamine in federally assisted housing will be considered.

Prior Updates

- FY 2022: SDHC will provide MTW funding to shelter providers through a competitive process, to develop and/or acquire new family congregate sites. In addition, the program budget will be increased to \$12.8 million, based on an average cost of \$52.06 per night.
- FY 2020: The program MTW budget was increased to \$8 million.

PLANNED NON-SIGNIFICANT CHANGES: SDHC may provide MTW funding for homelessness sector programs/services to provide shelter services and to develop and/or acquire new traditional congregate or alternative safe sheltering sites.

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2016-2. THE GUARDIAN SCHOLARS PROGRAM

PLAN YEAR: 2016

RE-PROPOSED: N/A

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC provides funding to San Diego State University to assist students with the housing component of their education. The target population is former foster care youth, wards of the court, or unaccompanied homeless youth. SDHC provides \$200,000 annually and matches up to an additional \$400,000 of philanthropic funds for an aggregate total of \$600,000 annually.

Prior Updates

- FY 2023: The SDHC will determine how frequently it will revisit based on market trends and funding availability the compensation to award the program
- FY 2021: A modified alternate HQS policy will be used for the units funded through the program.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2016-1. THE MONARCH SCHOOL PROJECT

PLAN YEAR: 2016

RE-PROPOSED: 2020

DESCRIPTION

Using Broader Uses of Funds Authority, SDHC created a pilot program to provide housing subsidy to homeless families with minors enrolled in Monarch School. The Achievement Academy delivers work readiness services (such as job placement and training) to the adult family members.

Prior Updates

- FY 2020: Activity was re-proposed, broadens the initiative to allow for permanent supporting housing as required.
- FY 2018: Activity now utilizes the Coordinated Entry System (CES) for programmatic referrals.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2015-1. MODIFY THE 40 PERCENT RENT BURDEN REQUIREMENT

PLAN YEAR: 2015
RE-PROPOSED: N/A

DESCRIPTION

Modifies the 40 percent affordability cap to 50 percent at initial lease-up in order to increase housing choice for low-income households.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2014-2. LOCAL INCOME INCLUSION

PLAN YEAR: 2014
RE-PROPOSED: N/A

DESCRIPTION

Income from Kin-GAP, foster care payments, and adoption assistance payments is included in the determination of the household's annual adjusted income. The activity utilizes waivers allowing for an alternate rent calculation methodology.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2013-6. TRANSITIONAL PROJECT-BASED SUBSIDIES FOR THE HOMELESS

PLAN YEAR: 2013
RE-PROPOSED: N/A

DESCRIPTION

Utilizing Broader Uses of Funds Authority, SDHC partners with agencies to craft a transitional housing program using project-based subsidies paired with supportive services, offered by the selected provider agency. SDHC is currently partnering with PATH, Episcopal Community Services, and Senior Community Center in this endeavor.

Prior Updates

- FY 2022: SDHC revised the maximum subsidy to be aligned with the HCV housing assistance payments per unit cost (PUC) per bed, and this may be adjusted periodically to account for rising costs of administering the program including, but not limited to, rising rental costs.
- FY 2020: A modified alternate HQS policy will be used for the beds funded through the program.
- FY 2017: The target populations are expanded to include homeless veterans and victims of human trafficking.
- FY 2016: Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. The maximum subsidy is \$700 per bed. The target populations are expanded to include homeless veterans and victims of human trafficking.
- FY 2015: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program.

PLANNED NON-SIGNIFICANT CHANGES: Project-based subsidy for these programs will be awarded on a competitive basis. The exception will be if the program is housed in an SDHC-owned and/or SDHC-controlled development (for example long-term, master lease), in which case the subsidy will be awarded non-competitively, per a prior HUD-approved MTW activity.

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2013-4. PUBLIC HOUSING: FLAT RENT ELIMINATION

PLAN YEAR: 2013
RE-PROPOSED: N/A

DESCRIPTION

Eliminate flat rents in public housing in order to facilitate the implementation of Path to Success for public housing residents. The activity utilizes waivers allowing SDHC to determine alternative rent policies within the public housing program.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2013-2. FAMILY SELF-SUFFICIENCY REINVENTION

PLAN YEAR: 2013

RE-PROPOSED: 2015

DESCRIPTION

Modifies the Family Self-Sufficiency (FSS) program by revising the contract term and the escrow calculation method to coincide with the Path to Success initiative. Changes to the program include a \$10,000 maximum on total escrow accumulation, escrow deposits based on outcomes achieved, and a two-year contract term with the option to extend the contract an additional three years if additional time is needed to attain goals.

Prior Updates

- FY 2022: HUD published the FSS Program Final Rule effective June 16, 2022. SDHC adopted the final rule, but will keep the flexibilities approved under the existing MTW FSS Program Activity.
- FY 2015: Activity was re-proposed to allow an adult household member to enroll in the program as the sole participant
- FY 2014: The FSS Action Plan detailing the flat escrow deposit feature of the program is pending submission to HUD for approval. The flat escrow deposit schedule containing the outcomes and the corresponding deposit amounts will be further described in the Fiscal Year 2013 MTW Annual Report.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2013-1. MTW VASH PROGRAM

PLAN YEAR: 2013

RE-PROPOSED: N/A

DESCRIPTION

Program features include the elimination of minimum rent for an initial time period, streamlined criminal history requirements for household members, and additional streamlining measures implemented using differing rent calculation and eligibility methodologies. On April 1, 2020, SDHC received approval to have VASH payment standards tied to 120% of the three Choice Communities payment standards.

Prior Updates

- FY 2023 – To support ongoing housing stabilization for VASH clients, SDHC extended the \$0 minimum rent requirement.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

2012-3. MODIFY FULL-TIME STUDENT DEFINITION

PLAN YEAR: 2012

RE-PROPOSED: N/A

DESCRIPTION

Modifies the full-time student definition to include only students ages 18 to 23 who are not the head, spouse, or co-head. Household members meeting the revised full-time student definition will receive a 100 percent employment income exclusion. All students, regardless of age or familial status, will be eligible for a graduation incentive wherein proof of graduation can be submitted in exchange for a monetary award. The activity utilizes waivers allowing SDHC to calculate rent using alternative methodologies.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2012-2. BIENNIAL REEXAMINATION SCHEDULE

PLAN YEAR: 2012

RE-PROPOSED: N/A

DESCRIPTION

A biennial reexamination schedule for the Work-Able and Elderly/Disabled population implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2016: SDHC converted the Elderly/Disabled population to a Biennial Reexamination Schedule effective July 1, 2015.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2012-1. PATH TO SUCCESS

PLAN YEAR: 2012

RE-PROPOSED: 2014, 2019, 2024

DESCRIPTION

A comprehensive rent reform model utilizing a tiered rent structure with progressive increases to minimum rents. The model eliminates deductions and streamlines allowances. Path to Success only applies to families considered Work-Able. Families defined as Elderly/Disabled receive streamlining measures and are not subject to Path to Success.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2019: The activity was re-proposed to increase minimum rents for Work-Able families and modify income bands to \$5,000 for all ranges.
- FY 2014: Re-proposed to include a local portability policy. The local portability policy component of the activity was implemented effective November 1, 2013. The standard HCV calculation may be used in PBV complexes servicing special needs populations.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: Metrics have been updated in the re-proposed activity description.

PLANNED SIGNIFICANT CHANGES: Path to Success has been re-proposed in the FY 2024 MTW Plan to include changes to utility allowance and household age designation.

2011-8. SPONSOR-BASED SUBSIDIES FOR THE HOMELESS

PLAN YEAR: 2011

RE-PROPOSED: 2013, 2017

DESCRIPTION

The local, non-traditional program created using Broader Uses of Funds Authority provides subsidies to individuals identified as homeless. Program participants receive housing and supportive services from sponsor organizations. Update: The Churchill development was allocated 72 sponsor-based subsidies in lieu of project-based vouchers.

- *Prior Updates* Baselines, benchmarks, and metrics were modified in the Fiscal Year 2017 Plan due to the re-proposal.
- FY 2017: Re-proposed to streamline the subsidy calculation process using the Path to Success rent calculation, and expands the populations served including both individuals and families.
- FY 2016: RFP solicitation process to include for-profit entities in addition to non-profit entities. Additionally, SDHC may award the subsidies to an SDHC-owned development without a competitive process. Partnering agencies may utilize the VI-SPDAT model to refer applicants for the housing program. Due to the success of the activity, SDHC is expanding the program to include funding beds in addition to units. A modified alternate HQS policy will be used for the beds funded through the program.
- FY 2013: Re-proposed to allow SDHC to allocate additional vouchers to the program, broaden the definition of homelessness, and apply MTW flexibilities to the rent calculation methodology.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2011-7.**DEVELOPMENT OF
PUBLIC HOUSING
UNITS USING A
COMBINATION OF
FUNDS****PLAN YEAR:** 2011**RE-PROPOSED:** N/A**DESCRIPTION**

SDHC creates/preserves public housing, without a competitive process, using acquisition and rehabilitation as the method of development.

Prior Updates

- FY 2014: Waivers corrected in the Fiscal Year 2012 Report to include MTW Agreement Attachment C, Section B(1)(b)(ii), B(1)(b)(vii) and B(1)(b)(viii) containing waivers of Sections 8 and 9(g)(3) of the 1937 Act and 24 CFR 982 and 990. MTW Agreement Attachment C, Section C (13) containing waivers of 24 CFR 941.40.
- FY 2013: This initiative was combined with the Fiscal Year 2010 Public Housing Development activity.

PLANNED NON-SIGNIFICANT CHANGES: None**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None**PLANNED SIGNIFICANT CHANGES:** None**2011-6. MODIFY****EIV INCOME REVIEW
SCHEDULE****PLAN YEAR:** 2011**RE-PROPOSED:** N/A**DESCRIPTION**

SDHC utilizes the EIV report only when processing full reexaminations of household composition, income, and assets according to the Biennial reexamination cycles. Waivers allow SDHC to adopt and implement policies for verifying family income and determining resident eligibility differing from current program requirements. The requirement to use the EIV report during interim certifications is eliminated.

PLANNED NON-SIGNIFICANT CHANGES: None**PLANNED CHANGES TO METRICS / DATA COLLECTION:** The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.**PLANNED SIGNIFICANT CHANGES:** None**2011-4.****ACQUISITION AND
DEVELOPMENT OF
ADDITIONAL
AFFORDABLE UNITS****PLAN YEAR:** 2011**RE-PROPOSED:** 2014**DESCRIPTION**

Uses Broader Uses of Funds Authority to acquire affordable housing units in San Diego using MTW funds.

Prior Updates

- SDHC continues to explore viable opportunities to create affordable housing.
- FY 2022: Any income that is generated from SDHC-owned properties developed through this initiative will be used for MTW-approved purposes like affordable housing.
- FY 2021: Any income that is generated from SDHC-owned properties developed through this initiative will be used for affordable housing purposes.
- FY 2020: SDHC is utilizing the initiative to develop accessory dwelling units (ADUs) per local ordinances to increase affordable housing options in the City of San Diego.
- FY 2014: Re-proposed to expand the methods of affordable housing development available to SDHC.
- FY 2012: Clarify that it will use this authority to preserve as well as acquire affordable housing in the City of San Diego.

PLANNED NON-SIGNIFICANT CHANGES: None**PLANNED CHANGES TO METRICS / DATA COLLECTION:** None**PLANNED SIGNIFICANT CHANGES:** None



IMPLEMENTED ACTIVITIES

2011-3. TWO YEAR OCCUPANCY TERM FOR PBV TENANTS

PLAN YEAR: 2011
RE-PROPOSED: 2013

DESCRIPTION

Requires Project-Based Voucher holders to complete two years of occupancy before becoming eligible to receive a tenant-based voucher. Waivers allow SDHC to determine waiting list procedures differing from current program requirements. The Mason Hotel and Parker-Kier contracts contain this requirement.

Prior Updates

- FY 2016: The Fiscal Year 2012 Report increased the threshold of the vacancy policy from 15% to 35%, a percent consistent with the baseline vacancy rate. The policy change benefits PBV households.
- FY 2013: Re-proposed to allow SDHC to create a policy stating, "No more than 15% of the tenants in any given development who become eligible to transition to a tenant-based voucher in any given year and no more than 10% in any given month can move from the PBV assisted complex. Policy change effective 2/1/2014.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2011-2. AUTHORIZE COMMITMENT OF PBV TO SDHC- OWNED UNITS

PLAN YEAR: 2011
RE-PROPOSED: N/A

DESCRIPTION

Streamlines the process of committing PBV to agency-owned units by using waivers to allow SDHC to project-base units utilizing a non-competitive process.

Prior Updates

- FY 2015: PBV units were added to the Mason Hotel and Parker-Kier, developments owned by SDHC.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2011-1. ALLOW LOWER RENTS FOR NON-ASSISTANT UNITS IN SDHC- OWNED DEVELOPMENTS

PLAN YEAR: 2011
RE-PROPOSED: N/A

DESCRIPTION

Uses a revised rent reasonableness protocol to determine rent reasonableness for assisted units in developments owned by SDHC. Rent reasonableness for the voucher assisted units is determined by comparisons to similar units in the surrounding neighborhoods rather than within the development.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2010-9. EXPAND THE PROJECT-BASED VOUCHER PROGRAM

PLAN YEAR: 2010
RE-PROPOSED: 2015

DESCRIPTION

SDHC allocates a greater percent of budget authority to project-based vouchers to serve a variety of the homeless population and low-income households in the City of San Diego. Authorizations waived allow SDHC to project-base 100 percent of the units in a development; create project-specific waitlists; utilize creative measures to allocate PBV in vacant and foreclosed properties; and designate greater than 20 percent of SDHC's allocation to PBV.

Prior Updates

- FY 2022: New PBV developments focused on Permanent Supportive Housing (PSH) may use Certificates of Occupancy or Temporary Certificates of Occupancy in lieu of an HQS inspections for units. This allows for inspections that have been performed for satisfying Tax Credit or HOME program requirements, as well as inspections by other governmental agencies that are substantially equivalent to HQS requirements. Subsequent inspections shall follow the standard biennial HQS process.
- FY 2021: SDHC changed the rent change period from HAP anniversary month to reexamination month. This will further streamline the process by allowing rent increases to be processed concurrently with the reexamination on the optimized reexamination effective date
- FY 2015: Re-proposed to adopt additional flexibilities to require residents to participate in supportive services as a condition of tenancy; allow project-specific waiting lists maintained by the owners or non-profit providers; approve exception payment standards exceeding 110 percent of the FMR without requiring HUD approval; and increase the number of designated PBV units in a contract after the first three years of the contract have elapsed.

PLANNED NON-SIGNIFICANT CHANGES: In alignment with national best practice and housing first principles, engagement in supportive services is not a condition of tenancy. However, project-based programs that serve special populations are expected to make available a variety of supportive services to best meet a specific population's needs. These expectations are memorialized in contract documents.

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

2010-7. ADOPT A LOCAL INTERIM CERTIFICATION POLICY

PLAN YEAR: 2010
RE-PROPOSED: 2012

DESCRIPTION

The local interim policy applies to non-elderly/non-disabled households and limits the number of interim adjustments to income to once in a 12-month timeframe. Additionally, decrease of income interims will be granted only if the loss of income is through no fault of the family, the decreased income results in a decrease to the rent portion greater than 20 percent, the decrease is not due to a sanction on public assistance income, and the family provides verification of eligibility or ineligibility for unemployment benefits if the reduced income is due to loss of employment.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2018: Effective July 1, 2018, SDHC eliminated the "No Fault of Your Own" policy as a reason to deny an interim request for a decrease in the rent portion. A review and analysis of the policy indicated minimal benefits.
- FY 2015: The policy applies to work-able families as defined under Path to Success. The activity utilizes the authority to implement an interim certification protocol differing from current mandates, thus allowing for locally driven policies concerning income change interims for families categorized as "Work-Able".
- FY 2012: Re-proposed to adopt a policies stating an interim adjustment of income will not be processed unless the change to the rent portion is greater than 20% and the loss of income must not occur through fault of the family. Baselines, benchmarks, and metrics were modified in the Fiscal Year 2012 Plan Amendment due to the re-proposal.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

**2010-6. SIMPLIFY
INCOME AND ASSET
VERIFICATION
SYSTEMS TO REDUCE
ADMINISTRATIVE
BURDEN**
**PLAN YEAR: 2010
RE-PROPOSED: 2016**
DESCRIPTION

Restructures the verification hierarchy, and assets valued at less than \$10,000 are not verified. The activity utilizes the authority to adopt and implement policies to calculate the rent differing from program requirements.

Prior Updates

- FY 2016: Re-proposed to eliminate assets from the verification and rent calculation process, gain the ability to deny program admission to applicants owning homes, and incorporate activity 2011-5 into the initiative.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None

**2010-5.
STANDARDIZE
UTILITY
ALLOWANCES BY
UNIT SIZE**
**PLAN YEAR: 2010
RE-PROPOSED: N/A**
DESCRIPTION

A simplified utility allowance structure where the utility allowance amount is based on whether or not the family is responsible for the water portion of the utilities. The activity utilizes the authority to adopt and implement policies to calculate the rent differing from program requirements.

PLANNED NON-SIGNIFICANT CHANGES: SDHC proposes to eliminate utility reimbursement payments and the utility allowance schedule requirement and remove the requirement to collect, analyze, and report information on utility responsibilities for all households participating in Path to Success.

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

**2010-4. CHOICE
COMMUNITIES**
**PLAN YEAR: 2010
RE-PROPOSED: 2012, 2018**
DESCRIPTION

Using the authority to implement a reasonable policy to establish payment standards differing from current program requirements, the poverty de-concentration effort providing incentives for families to move to one of nine local opportunity areas by using the following:

1. Moving for Opportunity Program
2. Revolving Security Deposit Loan fund
3. Increase payment standards in low-poverty areas

Prior Updates

- FY 2018: Re-proposed to increase flexibility related to determining payment standards. Payment standards are informed by hypothetical SAFMRs published by HUD, the information available at the time of the analysis.
- FY 2016: A Fiscal Year 2015 activity increased the rent burden to 50 percent program wide. Thus, the component eliminating the 40 percent rent burden is eliminated.
- FY 2012: Re-proposed to adopt a policy allowing SDHC to calculate payment standards below 90% of the FMR in high-poverty areas.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: None

PLANNED SIGNIFICANT CHANGES: None

**2010-2. AUTHORIZE
THE SDHC TO
INSPECT AND
DETERMINE RENT
REASONABLENESS
FOR SDHC OWNED
PROPERTIES**
**PLAN YEAR: 2010
RE-PROPOSED: N/A**
DESCRIPTION

Utilizes a local procedure to conduct inspections and determine rent reasonableness for SDHC-owned properties are conducted by SDHC.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



IMPLEMENTED ACTIVITIES

2010-1.

IMPLEMENT A

**REVISED INSPECTION
PROTOCOL**

PLAN YEAR: 2010

RE-PROPOSED: N/A

DESCRIPTION

The modified inspection protocol reduces the number of required inspections by placing qualifying units on a Biennial Inspection Cycle and allowing owners to self-certify Housing Quality Standards for minor fail items.

Prior Updates

- FY 2020: A technical amendment was approved in April 2020 to allow for modifications to the activity during periods of emergency operations.
- FY 2016: Through the initiative, SDHC will modify the requirements to "gain entry" into every 24 months to make a "first attempt to access" the unit every 24 months to comply with Federal requirements.
- FY 2015: Modified the activity to remove the qualifying criteria and authorize placement of all MTW units onto a Biennial Inspection Cycle.
- FY 2014: Results for HQS inspections occurring before implementation of the activity may not be considered for purposes of placement on the biennial inspection cycle.

PLANNED NON-SIGNIFICANT CHANGES: None

PLANNED CHANGES TO METRICS / DATA COLLECTION: The baseline and benchmark for CE# 1 have been updated to reflect the current HUD administrative reimbursement rate.

PLANNED SIGNIFICANT CHANGES: None



NOT YET IMPLEMENTED ACTIVITIES

2023-1.

PLAN YEAR APPROVED: 2023

**BLENDED SUBSIDIES
IN FAIRCLOTH-TO-
RAD CONVERSIONS**

RE-PROPOSED: N/A

DESCRIPTION

SDHC received permission for blended subsidies using MTW funds for Faircloth to RAD conversions. SDHC has been actively involved in creating and preserving additional affordable housing within the City of San Diego in other approved MTW activities through acquisitions, rehabilitations, and new developments. In addition, SDHC has an active activity relating to public housing development. Documentation from the PIH office of Capital Improvements, as of September 30, 2021, showed that SDHC had an availability of 1,220 units remaining under the Faircloth limit. Due to the remaining units in SDHC's Faircloth cap, SDHC is actively researching opportunities where a Faircloth-to-RAD conversion would be feasible. This activity would be utilized to make up the difference between the combined tenant paid portion and the RAD HAP subsidy up to the contract rent for converted units.

IMPLEMENTATION DATE TIMELINE: None**STATUS UPDATE:** SDHC is actively reviewing options to implement this activity.**DESCRIPTION OF NON-SIGNIFICANT CHANGES/MODIFICATIONS SINCE APPROVAL:** None

ACTIVITIES ON HOLD

**2010-8. ESTABLISH AN
HCV HOMEOWNERSHIP
PROGRAM**

PLAN YEAR APPROVED: 2010

IMPLEMENT DATE: OCT 01, 2009

RE-PROPOSED: N/A

HOLD DATE: JUL 01, 2014

DESCRIPTION

A homeownership program was created to assist income-eligible HCV participants with purchasing a home. Housing assistance payments are utilized to assist with a mortgage payment rather than as a rental payment. Incentives to purchase a foreclosed home are also program components. Waivers were enacted to modify the eligibility requirements for the program related to the minimum monetary threshold for savings accounts as well as implement the incentives for purchasing foreclosed homes.

REASON PLACED ON HOLD

The program was placed on hold due to decreasing housing stock and the resulting increasing housing prices, thus creating a housing market no longer accessible to low-income Housing Choice Voucher participants. New applications were no longer be accepted effective July 1, 2014 for the program. Families currently participating in the homeownership program continue to receive assistance.

STATUS UPDATE: None**ANTICIPATED REACTIVATION TIMELINE**

SDHC will evaluate the program annually to determine the feasibility of re-activating the program. Criterion to be evaluated will include the level of available housing stock, median housing prices, and the administrative capacity to increase the number of Housing Choice Voucher homeowners.

EXPLANATION OF NON-SIGNIFICANT CHANGES / MODIFICATIONS: Not Applicable

SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED

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CLOSED OUT ACTIVITIES

2014-4. HOUSING SUBSIDY PROGRAM FOR HOMELESS YOUTH	PLAN YEAR APPROVED: 2014 RE-PROPOSED: N/A DESCRIPTION Using Broader Uses of Funds Authority, SDHC created a time-limited pilot program to provide flat housing subsidies while a partnering agency delivers supportive services such as job placement, education, training, and case management. REASON(S) CLOSED OUT The activity was not implemented. SDHC published several competitive solicitations to procure a partner agency without success. Due to the inability to award a contract, SDHC closed out the activity.	IMPLEMENTATION DATE: N/A DATE CLOSED OUT: JULY 1, 2022
2014-1. TRANSITIONAL SUBSIDY PROGRAM FOR HOMELESS VETERANS	PLAN YEAR APPROVED: 2014 RE-PROPOSED: N/A DESCRIPTION Using Broader Uses of Funds Authority, SDHC partners with Veteran's Village of San Diego (VVSD) to craft a transitional housing program using flat subsidies paired with supportive services. SDHC provides the housing subsidy while VVSD provides the supportive services. REASON(S) CLOSED OUT Veteran's Village of San Diego, the intended partnering agency for the program, indicated a preference to pursue an alternative rental subsidy program.	IMPLEMENTATION DATE: JAN 01, 2014 DATE CLOSED OUT: OCT 01, 2014
2013-9. NEW PUBLIC HOUSING TRANSITION	PLAN YEAR APPROVED: 2013 RE-PROPOSED: N/A DESCRIPTION Families transitioning out of a state-aided rental assistance program (25% TTP) to the public housing program (30% TTP) receive a transition period during which the families pay more than 25 percent but less than 30 percent of adjusted household income toward the rent portion before moving to 30 percent at the end of the transition period. REASON(S) CLOSED OUT The flexibility requested under this initiative will not be required.	IMPLEMENTATION DATE: N/A DATE CLOSED OUT: SEP 30, 2013
2013-5. HOMELESS VETERAN PROJECT- BASED SUBSIDY PROGRAM	PLAN YEAR APPROVED: 2013 RE-PROPOSED: N/A DESCRIPTION Creates a local, non-traditional project-based subsidy pilot program to provide housing to veterans who are either not yet ready to enter a more regulated program or who temporarily exit a program. SDHC partners with Veteran's Village of San Diego for this activity. REASON(S) CLOSED OUT Veteran's Village of San Diego determined the activity as neither economically advantageous nor viable under current circumstances and requested permission to close out the activity.	IMPLEMENTATION DATE: N/A DATE CLOSED OUT: SEP 30, 2013
2013-3. ELIMINATION OF 100% EXCLUDED INCOME FROM THE INCOME VERIFICATION PROCESS	PLAN YEAR APPROVED: 2013 RE-PROPOSED: N/A DESCRIPTION Removes the requirement to verify and enter excluded income into the rent calculation formula and subsequently on the HUD 50058. REASON(S) CLOSED OUT Activity had originally been reactivated due to the expiration of PIH Notice 2013-03. A Final Rule FR 5743-F-03 was published, reactivating the streamlining measure.	IMPLEMENT DATE: SEP 01, 2012 DATE CLOSED OUT: JULY 01, 2020



CLOSED OUT ACTIVITIES

2012-4. PROJECT-BASED SUBSIDY PROGRAM FOR THE HOMELESS	<p>PLAN YEAR APPROVED: 2012</p> <p>RE-PROPOSED: N/A</p> <p>DESCRIPTION Using Broader Uses of Funds Authority, SDHC created a program which provides a flat subsidy based on the number of authorized units in the development; all program administration is performed by the development owner with monitoring and auditing performed by SDHC.</p> <p>REASON(S) CLOSED OUT SDHC determined the program structure as not advantageous to the agency's approach to ending homelessness on the City of San Diego. Efforts are focused in other development capacities.</p>	<p>IMPLEMENTATION DATE: N/A</p> <p>DATE CLOSED OUT: DEC 31, 2014</p>
2011-10. BROADER USES OF FUNDS FOR IDAS	<p>PLAN YEAR APPROVED: 2011</p> <p>RE-PROPOSED: N/A</p> <p>DESCRIPTION SDHC received permission to utilize MTW broader use of funds authority to subsidize IDAs not authorized by federal regulations.</p> <p>REASON(S) CLOSED OUT The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority, but rather single-fund flexibility. The activity is no longer active.</p>	<p>IMPLEMENTATION DATE: JUL 01, 2010</p> <p>DATE CLOSED OUT: JUN 30, 2011</p>
2011-9. ENHANCE FAMILY SELF-SUFFICIENCY PROGRAM	<p>PLAN YEAR: 2011</p> <p>RE-PROPOSED: N/A</p> <p>DESCRIPTION In the event the head of household is unable to enroll in the FSS program (such as due to a disability), an adult household member may enroll in the program as the sole participant.</p> <p>REASON(S) CLOSED OUT Per HUD's recommendation, the initiative will be combined with the FSS Reinvention activity via a re-proposal in the Fiscal Year 2015 MTW Annual Plan.</p>	<p>IMPLEMENTATION DATE: OCT 01, 2010</p> <p>DATE CLOSED OUT: JUL 01, 2014</p>
2011-5. DISREGARD RETIREMENT ACCOUNTS	<p>PLAN YEAR: 2011</p> <p>RE-PROPOSED: N/A</p> <p>DESCRIPTION SDHC disregards retirement accounts when verifying an applicant or participant's assets.</p> <p>REASON(S) CLOSED OUT The re-proposal of activity 2010-6 wherein assets are eliminated from the rent calculation eliminates the need for the activity.</p>	<p>IMPLEMENTATION DATE: AUG 01, 2010</p> <p>DATE CLOSED OUT: JUN 30, 2015</p>
2010-10. UNDERTAKE PUBLIC HOUSING DEVELOPMENT	<p>PLAN YEAR: 2010</p> <p>RE-PROPOSED: N/A</p> <p>DESCRIPTION/UPDATE Acquire, rehabilitate, or produce housing units as public housing.</p> <p>REASON(S) CLOSED OUT This activity was closed out in the Fiscal Year 2011 MTW Report. Public Housing development will occur under the Fiscal Year 2011 Public Housing Development initiative which combines the authorizations and flexibilities.</p>	<p>IMPLEMENTATION DATE: JUL 01, 2010</p> <p>DATE CLOSED OUT: JUN 30, 2011</p>
2010-3. TRIENNIAL REEXAMINATIONS FOR ELDERLY AND DISABLED HOUSEHOLDS	<p>PLAN YEAR: 2010</p> <p>RE-PROPOSED: N/A</p> <p>DESCRIPTION/UPDATE Allows families defined as Elderly/Disabled to participate in a Triennial Reexamination Cycle. COLA updates to social security and veteran's benefits are processed in the "off" years. The activity was implemented using the authority to redefine the cycle utilized for the full reexamination of income and household composition.</p> <p>REASON(S) CLOSED OUT SDHC closed out the activity to streamline the reexamination process for Path to Success participants and rental assistance staff. Multiple reexamination processes for households proved difficult to administer when population changes occurred between Work-Able and Elderly/Disabled households. Path to Success households are placed on a biennial reexamination process effective with July 2015 reexamination. The PBV and FUP programs remain on an annual reexamination cycle.</p>	<p>IMPLEMENTATION DATE: OCT 01, 2009</p> <p>DATE CLOSED OUT: JUL 01, 2015</p>



CLOSED OUT ACTIVITIES

2009-1. ACHIEVEMENT ACADEMY OF THE SAN DIEGO HOUSING COMMISSION	PLAN YEAR: 2009	IMPLEMENTATION DATE: OCT 01, 2010
	RE-PROPOSED: N/A	DATE CLOSED OUT: JUN 30, 2011
	DESCRIPTION/UPDATE	
	The SDHC Achievement Academy, formerly known as the Economic Development Academy, offers a broad range of one-on-one services and workshops geared toward workforce preparation, financial literacy, and homeownership education.	
	REASON(S) CLOSED OUT	
	The activity is a Section 8 activity not requiring regulatory waivers or broader uses of funds authority. The activity is ongoing but reported as a single fund flexibility activity in Section 5 of the Plan	



SECTION V – SOURCES AND USES OF MTW FUNDS

ESTIMATED SOURCES AND USES OF MTW FUNDS

I. ESTIMATED SOURCES OF MTW FUNDS

The MTW PHA shall provide the estimated sources and amount of MTW funding by Financial Data Schedule (FDS) line item.

SOURCES		
FDS LINE ITEM	FDS LINE ITEM NAME	DOLLAR AMOUNT
70500 (70300+70400)	TOTAL TENANT REVENUE	\$0
70600	HUD PHA OPERATING GRANTS	\$259,280,764
70610	CAPITAL GRANTS	\$0
70700 (70710+70720+70730+70740+70750)	TOTAL FEE REVENUE	\$0
71100+72000	INTEREST INCOME	\$0
71600	GAIN OR LOSS ON SALE OF CAPITAL ASSETS	\$0
71200+71300+71310+71400+71500	OTHER INCOME	\$5,142,282
70000	TOTAL REVENUE	\$264,423,046

II. ESTIMATED USES OF MTW FUNDS

The MTW PHA shall provide the estimated uses and amount of MTW funding by Financial Data Schedule (FDS) line item.

SOURCES		
FDS LINE ITEM	FDS LINE ITEM	DOLLAR AMOUNT
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	TOTAL OPERATING - ADMINISTRATIVE	\$12,677,065
91300+91310+92000	MANAGEMENT FEE EXPENSE	\$0
91810	ALLOCATED OVERHEAD	\$10,126,318
92500 (92100+92200+92300+92400)	TOTAL TENANT SERVICES	\$1,708,389
93000 (93100+93600+93200+93300+93400+93800)	TOTAL UTILITIES	\$0
93500+93700	LABOR	\$0
94000 (94100+94200+94300+94500)	TOTAL ORDINARY MAINTENANCE	\$0
95000 (95100+95200+95300+95500)	TOTAL PROTECTIVE SERVICES	\$0
96100 (96110+96120+96130+96140)	TOTAL INSURANCE PREMIUMS	\$397,237
96000 (96200+96210+96300+96400+96500+96600+96800)	TOTAL OTHER GENERAL EXPENSES	\$8,727,482
96700 (96710+96720+96730)	TOTAL INTEREST EXPENSE AND AMORTIZATION COST	\$0
97100+97200	TOTAL EXTRAORDINARY MAINTENANCE	\$0
97300+97350	HOUSING ASSISTANCE PAYMENTS + HAP PORTABILITY-IN	\$230,786,556
97400	DEPRECIATION EXPENSE	\$0
97500+97600+97700+97800	ALL OTHER EXPENSES	\$0
90000	TOTAL EXPENSES	\$264,423,046

Please describe any variance between Estimated Total Revenue and Estimated Total Expenses:

III. DESCRIPTION OF PLANNED USE OF MTW SINGLE FUND FLEXIBILITY

SDHC utilizes single-fund flexibility to fund the Achievement Academy and to provide funding for services in support of the Community Action Plan on Homelessness and the SDHC Housing Intervention Continua. The Achievement Academy is a learning and skills center available to families participating in the Housing Choice Voucher and Public Housing programs. Programs offered at the Achievement Academy are geared to workforce readiness and financial literacy. The Family Self-Sufficiency program is another component of the Achievement Academy. Please note: Individual Development Accounts are no longer funded with MTW single-fund flexibility. Please see the following pages for a thorough discussion of each activity.



SINGLE FUND FLEXIBILITY NARRATIVE

ENVISION CENTER DEMONSTRATION PROGRAM

In June of 2018, HUD announced the designation of EnVision Centers in 17 communities across the nation. SDHC was selected for the only location in California, and only one of three co-located within a designated Promise Zone.

Initially implemented with two locations to provide client flexibility, the Southeast San Diego location closed due to the pandemic. The location housed at the SDHC's Achievement Academy is temporarily closed to in-person traffic while staff continues to work remotely. Services, however, continue to be offered online. EnVision Centers are open to any households currently receiving SDHC's rental assistance and also those on the waitlist. Other clients served include residents of the Promise Zone.

EnVision Centers leverage public and private resources to help clients achieve goals to secure economic security. To foster long-lasting self-sufficiency, EnVision Centers provide support in the following four areas of focus: Economic Empowerment; Education; Health/Wellness; and Character/Leadership.

FAMILY SELF-SUFFICIENCY: EDEN HOUSING INC.

In November 2020, the SDHC Achievement Academy signed a contract with Eden Housing, Inc., a California nonprofit public benefit corporation, to implement a Family Self-Sufficiency (FSS) program at two of its San Diego properties. This marks the first time HUD has authorized a public housing authority to run an FSS program for a private multifamily developer. The FSS program will operate under HUD's guidelines for the traditional five-year program and not the Achievement Academy's MTW approved two-year program.

ACHIEVEMENT ACADEMY

SDHC uses single-fund flexibility in support of MTW activities to enhance self-sufficiency programming. SDHC combines funds from public housing operating and capital fund assistance (authorized by section 9 of the United States Housing Act of 1937 [the Act]) and voucher funds (authorized by section 8 (o) of the Act) to implement a block grant/single-fund budget approach to budgeting and accounting. SDHC has consolidated public housing and HCV program funds to implement the approved Moving to Work initiatives described in previously approved MTW Plans and will continue to do so in future Plans.

SDHC uses single-fund flexibility to conduct a variety of activities geared toward self-sufficiency. The Achievement Academy offers a broad range of one-on-one services and workshops geared toward workforce readiness and financial literacy. Partnerships with a variety of external organizations specializing in their fields enable SDHC to provide assistance to participants with different interests, career focuses, and skill levels. Leveraging funding from outside sources increases the services provided to participants. When possible, staff looks for grants that provide funding and coaching to assist both staff and participants. Following the Financial Opportunity Center (FOC) model, created by funding from the Local Initiatives Support Corporation (LISC), the Achievement Academy is able to provide robust services to participants that go beyond job leads and help support self-sufficiency. The resources offered at the Achievement Academy are a vital component of the Path to Success rent reform activity as participants are incentivized to increase income and work towards self-sufficiency. SDHC plans to continue and grow these partnerships to better serve our families and increase economic self-reliance. The narrative below describes some of the services offered at the Achievement Academy.

It is worth noting that while the COVID-19 pandemic temporarily disrupted and altered the Achievement Academy's service delivery model, it did not prevent services from reaching clients in new and creative ways. Like most businesses across the country and elsewhere, SDHC Achievement Academy staff quickly reworked in-person meetings and workshops to Zoom or other online platforms. The change in service delivery proved to be more accessible and convenient for many clients resulting in increased participation in workshops and programmatic events.



EMPLOYMENT/WORKFORCE DEVELOPMENT

JOB DEVELOPER

One of the Achievement Academy Workforce Readiness Specialist (WRS) positions serves as a job developer and makes connections with employers of in-demand occupations; organizes job fairs; and coordinates employment services with partner organizations. Training for participants covers such topics as on-line job search, résumé writing, interviewing tips, and customer service. The Achievement Academy also partners with Manpower, an industry leader in employment services. Manpower helps to leverage connections in the business community to help open doors to companies that typically have been a struggle for participants to get into in the past.

ONE-STOP CAREER CENTER

The San Diego Workforce Partnership (SDWP) provides services via a satellite One-Stop Career Center at the local downtown public library. SDWP staff offers workforce development services including labor market information, career development, assessment, job search/retention skills, job placement assistance, and referrals to training opportunities.

SMALL BUSINESS DEVELOPMENT TRAINING

The SDHC Achievement Academy partners with Access to support entrepreneurs who want to start or expand a small business. Microenterprise services and training offered to clients include creating, or expanding, a business plan; obtaining a business license; one-on-one business counseling; market training & research; and financial literacy support among other services.

EMPLOYMENT/WORKFORCE DEVELOPMENT WORKSHOPS

The SDHC Achievement Academy offers employment readiness workshops and provides access to temporary and permanent employment through employer connections. Workshops include: Returning to the Workforce; The Job Search Rollercoaster; Teamwork Skills Everyone Needs; and 10 Keys for Professional Success among others. The Achievement Academy also hosts recruitment fairs via Zoom. Participants are invited to presentations from hiring organizations and hear directly from human resources representatives how to get hired at their company. Topics covered range from the job application and résumé submittal process to interview preparedness and communication skills. Many of the participating recruitment organizations guarantee, at minimum, an interview to SDHC clients.

YOUTH PROGRAMS

Staff at the Achievement Academy strives to offer innovative programming in an effort to keep participants interested and engaged. One WRS position focuses on developing programming for “opportunity youth”, defined as young adults between sixteen and twenty-four years of age who are not working and not enrolled in school. Students receive education counseling or career guidance. The Achievement Academy has partnered with Access, Inc. to provide additional training and services to these young adults.

ACADEMY COMPUTER LAB

The SDHC Achievement Academy computer lab is currently closed to in-person activity as staff continues to work remotely. During the early shutdown of the pandemic SDHC partnered with Computers2Kids to provide laptops to assist with digital access to SDHC families. This partnership, made possible with a grant from the Local Initiatives Support Corporation (LISC), allows families to participate in on-line school and job search activities. Currently, families are referred to local libraries where free Wi-Fi devices and equipment may be checked out. .

INCOME SUPPORTS

BENEFITS SCREENING

SDHC Achievement Academy staff work with clients on benefits screening. Application assistance is currently offered for an array of program such as CalWorks, Women Infants and Children (WIC), California Healthy Families, Child Care Assistance, MediCal, and

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Supplemental Nutrition Assistance Program (SNAP). Additionally, clients are referred to Dreams for Change for tax assistance programs.

FINANCIAL EDUCATION

FINANCIAL COUNSELING

The Achievement Academy has been able to have several WRS positions trained as certified Financial Counselors. The Financial Counselors offer credit counseling in debt reduction, credit repair, budgeting, and cash management skills. These services have been incorporated into the FOC service delivery model utilized within the Achievement Academy.

FINANCIAL SKILLS EDUCATION WORKSHOPS

Financial Education workshops are routinely offered in the following topic areas: Debt and credit repair; credit score improvement; controlling expenses; maintaining a financial fitness plan; electronic banking and direct employee deposits; budget management, ordering, reviewing, and repairing credit report; investments strategies and options; and pensions/retirement planning.

FINANCIAL COACHING TRAINING

SDHC WRS staff utilize the LISC Financial Counseling Model to implement innovative coaching methods during one-on-one appointments with participants. SDHC is also positioned to assist participants with improving credit through a partnership with Credit Builders Alliance. The ability to internally pull credit reports allows SDHC to further assist participants with accessing current credit ratings in order to begin aligning client goals for credit improvement to future financial and career goals.

The chart below contains a summary of the results of Achievement Academy activities at the close of Fiscal Year 2022.

ACHIEVEMENT ACADEMY			
METRIC	BASELINE	OUTCOME	BENCHMARK ACHIEVED?
Number of rental assistance participants receiving core services	982	1188	Yes
Number of rental assistance participants with an increase in earnings	229	254	Yes
Number of rental assistance participants placed in employment	144	195	Yes
Number of rental assistance participants employed for 12 or more consecutive months	44	92	Yes
Number of rental assistance participants who attended a work readiness workshop	727	984	Yes
Percent of rental assistance participants who attended a recruitment and resource fair and obtained employment as a direct result	0%	0%	Yes
Number of rental assistance participants who completed vocational or bridge training	0	5	Yes

FLEXIBLE FUNDING FOR SUPPORTIVE SERVICES

In addition to the Achievement Academy, SDHC utilizes MTW funds to provide supportive services that would align with the City of San Diego's Community Action Plan on Homelessness. The Community Action Plan on Homelessness identified a homeless-crisis-response-system service gap. Households can often present in significant crisis, and in the early stage of the crisis presentation it can be challenging to determine whether the homelessness/housing crisis is due to situational or structural factors/barriers in the



household/individual. Flexible funding used towards supportive services, in this instance, help fund a central point of contact and centralized resources for households as they move between the various programs available.

Examples of supportive services that SDHC seeks to provide via flexible funding include, but are not limited to:

- Centralized Case Management
- Mental Health Services
- Physical Healthcare Services
- Behavioral Healthcare
- Substance Use Services
- Life Skills Training
- Education Services
- Employment Assistance
- HIV Services

This flexible supportive services approach creates individualized emergency intervention and housing planning for the household/individual to best meet the participant's needs with a focus on aligning the right level of intervention with the critical need, promoting self-sufficiency and identifying the best resource to help participants thrive and overcome both situational and structural barriers to long-term housing stability.

For example, SDHC has drafted a Housing Intervention Continua, which delves into how at-risk populations can be served via centralized resources if funded via this proposed activity. The Continua contains multiple approved local non-traditional MTW activities, in which case management is operated separately. Currently, if a household moves from one program to another, this could necessitate a change in who their point of contact is. This continua could utilize flexible funding to focus on using centralized case management in order to help households more successfully navigate available programs, which includes Homeless Shelter Beds, Prevention and Diversion Programs, Moving Home, Sponsor-Based Subsidies, as well as the Achievement Academy and other approved programs. In this instance, centralized case management would remain with participating household from the beginning and continue with them in order to direct which program is most appropriate for their situation. Flexible funding would ensure that even if the household move into another housing program, their case management point of contact would remain with them until exit.

While funding for supportive services within the aforementioned Homeless Housing Continua could be an immediate use of the activity, it is expected that flexible funding for supportive services could also be used towards other households and programs eligible for assistance from SDHC. In addition, funding may be utilized to support administrative staff whose main job duties are to develop, monitor, or support efforts that align with this initiative and SDHC's commitment to further progress towards goals of the Community Action Plan on Homelessness for the City of San Diego. Another potential application SDHC recently encountered occurred during an acquisition using CARES Act funding. While funding was available for the acquisition, the supportive services that were needed were not included. This, if approved, could be used to bridge similar gaps encountered in the acquisition and development process based on other funding sources used.

Another example could be providing assistance to households in obtaining broadband access that is increasingly necessary for education and remote work opportunities, this could include flexible funding for tenant-based households or the use of funds to provide high speed internet access at SDHC-owned and/or controlled properties. As a result of the COVID-19 pandemic, in the City of San Diego, there has been an expansion of remote learning opportunities that may persist for educational outreach after a return to in person classes. Remote learning and conferencing often requires video capabilities, which means that broadband access is required. Not all households have access to this resource, and flexible funding could help provide for households in need in order to prevent a long-term disadvantage. In addition, families with children that would have access would also help their parents or guardians in additional access to job search resources, as well as provide them the ability to work possibly work remotely.

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Flexible funding would help to fund case management staff and financial assistance to stabilize a household's immediate housing crisis. Coupled with financial assistance to address immediate needs, case management helps to minimize the negative impact of unstable housing for individuals and families who are at risk of or actively experiencing homelessness. Prevention and Diversion assistance is individualized to each household's unique needs and stabilization activities may include:

- Short-term, light-touch case management
- Housing search assistance
- Financial literacy resources
- Workforce readiness resources
- Landlord/roommate conflict mediation
- Connection to services and/or public assistance benefits

PREVENTION/DIVERSION

SDHC will utilize MTW flexible funds to provide services that reduce the inflow into the current homelessness system through prevention and diversion. Prevention and Diversion services strive to prevent homelessness before it occurs as well as to divert individuals who are experiencing homelessness to other housing opportunities outside of the region's homeless crisis response system. Prevention and Diversion is aligned with the Housing First model of addressing homelessness, an approach to successfully connect households at risk of or experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. Preventing or shortening an episode of homelessness for individuals and families greatly reduces the likelihood of another occurrence of housing instability or progression to chronic homelessness. Further, these efforts also help minimize the impact for overburdened shelter systems in San Diego. In addition to supportive services through case management, Prevention and Diversion utilizes financial assistance in the form of rent, rent arrears, utility payments, security deposits and application fees to stabilize housing for individuals and families facing a housing crisis. Depending on the nature of the housing crisis being addressed through our Prevention and Diversion programs, SDHC may choose to use habitability checks in lieu of HQS inspections.

LANDLORD ENGAGEMENT AND ASSISTANCE PROGRAM (LEAP)

SDHC will utilize MTW flexible funds to the Landlord Engagement and Assistance Program or LEAP, which aims to increase access to the existing market of available units for individuals and families experiencing homelessness. LEAP is aligned with the Housing First model of addressing homelessness, an approach to successfully connect households experiencing homelessness to services, programs, and housing options without preconditions and barriers to entry. Depending on the nature of the housing crisis being addressed, SDHC may choose to use habitability checks in lieu of HQS inspections.

LEAP works directly with landlords and property management companies within the City of San Diego to help move individuals and families into housing quickly. LEAP offers incentives to landlords as well as the Landlord Contingency Fund and landlord liaison services. Flexible funding used towards LEAP services would help to fund a SDHC staff landlord liaison, support to individuals and families to identify housing units and financial assistance for them to pay move-in costs like security deposits including holding fees, application fees, utility assistance, rent arrears and vacancy loss.

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IV. PLANNED APPLICATION OF PHA UNSPENT OPERATING FUND AND HCV FUNDING

ORIGINAL FUNDING SOURCE	BEGINNING OF FY – UNSPENT BALANCES	PLANNED APPLICATION OF PHA UNSPENT FUNDS DURING FY
HCV HAP*	\$26,861,326	\$26,861,326
HCV Admin Fee	\$0	\$0
PH Operating Subsidy	\$1,321,109	\$1,321,109
TOTAL:	\$28,182,435	\$28,182,435

Description of Planned Expenditures of Unspent Operating Fund and HCV Funding:

SDHC anticipates HCV HAP unspent balance will be used to cover increased voucher costs due to utilization rate being greater than 100%; to cover program administration cost; to fund the acquisition, preservation, and renovation of affordable housing units in the City of San Diego; and to fund local non-traditional including homelessness programs costs.

Public Housing unspent fund balances are operating and replacement reserves related to SDHC regulatory agreement with the Department of Housing and Community Development, a public agency of the State of California, for public housing projects CA063000009 and CA063000010.

* Unspent HAP funding should not include amounts recognized as Special Purpose Voucher reserves

**HUD's approval of the MTW Plan does not extend to a PHA's planned usage of unspent funds amount entered as an agency's operating reserve. Such recording is to ensure agencies are actively monitoring unspent funding levels and usage(s) to ensure successful outcomes as per the short- and long-term goals detailed in the Plan

LOCAL ASSET MANAGEMENT PLAN

Did the MTW PHA allocate costs within statute in the Plan Year?

Yes

Did the MTW PHA implement a local asset management plan (LAMP) in the Plan Year?

No

Did the MTW PHA provide a LAMP in the appendix?

No

If the MTW PHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that the MTW PHA did not make any changes in the Plan Year.

SDHC did not operate a Local Asset Management Plan during Fiscal Year 2023

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION

DESCRIPTION OF RAD PARTICIPATION

The MTW PHA shall provide a brief description of its participation in RAD. This description must include the proposed and/or planned number of units to be converted under RAD, under which component the conversion(s) will occur, and approximate timing of major milestones. The MTW PHA should also give the planned/actual submission dates of all RAD Significant Amendments. Dates of any approved RAD Significant Amendments should also be provided.

Rental Assistance Demonstration (RAD) Participation Description:

N/A

Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

N/A

SECTION IV – APPROVED MTW ACTIVITIES: HUD APPROVAL PREVIOUSLY GRANTED



If the MTW PHA has provided RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A



SECTION VI – ADMINISTRATIVE

A. BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

See Appendix A

B. DOCUMENTATION AND PUBLIC PROCESS

See Appendix B

C. PLANNED OR ONGOING EVALUATIONS

There are no planned or ongoing evaluations

D. LOBBYING DISCLOSURES

See Appendix C



APPENDIX A: BOARD RESOLUTION AND CERTIFICATIONS OF COMPLIANCE

BOARD RESOLUTION

PAGE 1 OF 3

SAN DIEGO HOUSING COMMISSION

RESOLUTION NO. HC-1976

ADOPTED ON March 17, 2023

A RESOLUTION APPROVING THE SAN DIEGO HOUSING COMMISSION'S FISCAL YEAR 2024 MOVING TO WORK ANNUAL PLAN AND RELATED ACTIONS.

WHEREAS, the San Diego Housing Commission (Housing Commission) is one of 39 original Moving to Work (MTW) agencies out of approximately 3,200 public housing authorities (PHAs) nationwide; and

WHEREAS, the MTW designation from the U.S. Department of Housing and Urban Development (HUD) grants PHAs the flexibility to design innovative, cost-effective ways of providing federal housing assistance to low-income families; and

WHEREAS, HUD requires MTW agencies to submit an Annual Plan, including all proposed initiatives and revisions to previously approved initiatives; and

WHEREAS, the new initiatives in the Housing Commission's Fiscal Year 2024 MTW Annual Plan, described more particularly in Housing Commission Report No. HCR23-013 and its Attachment, are designed to increase housing opportunities for low-income families ; and

WHEREAS, the Housing Authority of the City of San Diego previously adopted Resolution HA-1562, effective July 10, 2012 (2012 HA Resolution), which delegated authority to the Housing Commission Board of Commissioners (Housing Commission Board) to "make amendments to and adopt Administrative Plans and MTW [Moving to Work] initiatives" as authorized by San Diego Municipal Code section 98.0301, paragraphs (d)(3) and (d)(7)"; and

-PAGE 1 OF 3-



BOARD RESOLUTION

PAGE 2 OF 3

WHEREAS, on January 12, 2023, the Housing Commission Board held an informational public workshop on the proposed Fiscal Year 2024 MTW Annual Plan; and

WHEREAS, on March 17, 2023, consistent with the 2012 HA Resolution, the Housing Commission Board approved the proposed Fiscal Year 2024 MTW Annual Plan and related actions; NOW, THEREFORE,

BE IT RESOLVED by the Housing Commission Board as follows:

1. The Housing Commission's Fiscal Year 2024 MTW Annual Plan is approved.
2. The Housing Commission's President & Chief Executive Officer (President & CEO), or designee, is authorized to execute all documents and instruments necessary and/or appropriate to implement these approvals, in a form approved by General Counsel, and to take such actions as are necessary and/or appropriate to implement these approvals, provided that a copy of the documents, signed as to form by General Counsel, is submitted to each Housing Commissioner.

-PAGE 2 OF 3-




BOARD RESOLUTION

PAGE 3 OF 3

THIS ACTION WILL BECOME FINAL ON March 24, 2023, subject to the provisions of San Diego Municipal Code Section 98.0301(e)(1).


Approved as to Form:
Christensen & Spath

By:


Charles B. Christensen, General Counsel
San Diego Housing Commission

I certify that the foregoing actions in this Resolution were approved by the San Diego Housing Commission Board of Commissioners at its meeting on March 17, 2023.

By:


Scott Marshall
Vice President, Communications &
Government Relations

Approved: 3-27-23


Jeff Davis

Interim President & Chief Executive Officer
San Diego Housing Commission

-PAGE 3 OF 3-



Passed and adopted by the San Diego Housing Commission on March 17, 2023, and finalized on March 24, 2023, pursuant to the provisions of San Diego Municipal Code Section 98.0301(e)(1), by the following vote:

	Yeas	Nays	Excused	Not Present
Stefanie Benvenuto	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ryan Clumpner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Johanna Hester	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Kellee Hubbard	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Eugene "Mitch" Mitchell	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Melinda K. Vásquez	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

AUTHENTICATED BY:

Jeff Davis

Interim President & Chief Executive Officer of the
San Diego Housing Commission

I HEREBY CERTIFY that the above and foregoing is a full, true and correct copy of
RESOLUTION NO. 1976 passed and adopted by the San Diego Housing Commission on
March 17, 2023, and finalized on March 24, 2023.

By:

Scott Marshall
Secretary of the San Diego Housing Commission



CERTIFICATIONS OF COMPLIANCE

(PAGE 1 OF 2)

CERTIFICATIONS OF COMPLIANCE

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING**

**Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairman or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (07/01/2023), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.



CERTIFICATIONS OF COMPLIANCE

(PAGE 2 OF 2)

- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

San Diego Housing Commission

CA 063

MTW PHA NAME**MTW PHA NUMBER/HA CODE**

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Jeff Davis

Interim President and CEO

NAME OF AUTHORIZED OFFICIAL**TITLE**

DocuSigned by:

 5E004000AB0474...

3/29/2023

SIGNATURE**DATE**

* *Must be signed by either the Chairman or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*



APPENDIX B: DOCUMENTATION AND PUBLIC PROCESS

DOCUMENTATION OF PUBLIC PROCESS

The public comment period for the MTW Annual Plan began on December 29, 2022 and concluded on January 31, 2023. Efforts were made to make residents, tenants, and the public aware of the availability of the Plan and comment period, including posting the San Diego Union Tribune, El Latino, and the SD Voice, and mailing an invitation to the hearing to a random selection of residents. The draft plan was made publicly available on SDHC's website or by requesting a hard copy. Staff presented the draft MTW Plan to the SHDC Board of Commissioners in a public meeting on January 12, 2023, and a public hearing was held remotely on January 25, 2023 at 11:00 a.m. Two members of the public attended the public hearing. One public comment was received during the public hearing, which did not support the proposed changes to Path to Success.

Results of these meetings and processes were taken into consideration in finalizing the MTW Plan. Documentation of this process can be made available to HUD upon request.



PUBLIC NOTICE – EL LATINO

El Latino - San Diego

Diciembre 16 al 22 del 2022

21

REQUEST FOR LETTERS OF INTEREST/STATEMENT OF QUALIFICATIONS

WSP USA Inc. is one of the world's leading engineering consulting firms with an office in San Diego. In preparation for future projects, WSP is seeking to prequalify local sub consulting firms to support the **CITY OF SAN DIEGO**

AS-NEEDED STORMWATER DESIGN AND ENGINEERING SERVICES CONTRACT.

We are seeking qualified DBE, MBE, and WBE firms to be part of our team. We encourage those qualified and interested to submit the following:

- Letter of interest indicating which discipline (choose from list below) to be considered for,
- Firm qualifications, including a list of current certifications,
- Resumes of proposed staff (up to two relevant resumes per discipline),
- Project descriptions, including reference information (please include two relevant project descriptions per discipline).

We are seeking submittals from small businesses with the following areas of expertise:

- Architectural/Landscape Architecture
- Environmental Documents and Permitting
- Civil Engineering
- ADA Law Assessments and Design
- Right of Way Acquisition
- Utility Research and Location
- Structural Engineering
- Geotechnical Engineering
- Surveying

Letters of Interest and Statements of Qualifications are to be emailed to carina.orsino@wsp.com no later than 5:00 pm on December 30, 2022. For more information about WSP, please visit our website at wsp.com.

Invitation for Bids Otay Mesa East Port of Entry Utilities Construction Project IFB SOL1003758 CIP 1201106

The SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG), 401 B Street, Suite 800, San Diego, CA 92101-4231, is requesting bids to perform the work as follows.

The Work consists, in general, of extension of SDG&E, Cox Communication, and AT&T utility substructure to the future Otay Mesa East Port of Entry (OME POE) and Commercial Vehicle Enforcement Facility (CVEF) sites. Generally, construction will consist of installation of new PVC electrical conduit, PVC communication conduit, Polyethylene (PE) gas pipe and fittings, and various ancillary work for installation of electrical manholes/vaults, telecommunication manholes/vaults, and equipment pads. The construction includes approximately 975 LF of concrete encased SDG&E electrical ducts, consisting of four (4)-5" and two (2)-4" primary electrical conduits, two new 3316 electrical handholes and a new box pad for a future PME electrical switch. Construction also includes extension of SDG&E's 4" PE gas main for approximately 965 LF, from approximately 200 feet west of the Siempre Viva Road intersection with Paseo de la Fuente to the gas main stub at the location of the future OME POE connector road cul-de-sac. The work also includes extension of approximately 275 LF of sewer line with 5 new manholes at standard and extra depth, and 890 LF of new 12-inch water mains with new service laterals to the OME POE, and procuring all materials and performing all other work necessary to complete the Work in accordance with the Contract Plans and SANDAG Special Provisions.

The engineer's estimate for this work is \$2,545,546.20. The prime contractor must have an A license at time of bid submittal. The Prime contractor must perform with their own organization at least 35% of the work. The project is funded in whole or in part with State of California SB1 Trade Corridor Enhancement funding. No DBE goals apply to this opportunity.

A nonmandatory prebid meeting will be held virtually on December 13 th at 2:00 pm PDT. All prospective bidders are highly encouraged to attend. It is an opportunity to learn about the project and ask questions. There will be no site walk. At the virtual prebid meeting we will share images of the site. The project area is accessible to all. Bidders are reminded to stay in the public right of way. The link to the virtual prebid meeting will be shared via SANDAG's bidding platform and vendor portal.

This IFB package can be downloaded at no charge from the SANDAG website at www.sandag.org/contracts. Register in SANDAG's bidding platform and vendor portal and download the IFB and plans. SANDAG is the only source of accurate information about SANDAG projects.

Bids are to be submitted electronically through SANDAG's bidding platform and vendor portal by January 10 th, 2023 at 2:00pm PDT, unless otherwise noted in an addendum. Bids submitted later than 2:00 p.m. PDT, or at a location other than SANDAG's bidding platform and vendor portal, will not be considered.

SANDAG is an equal opportunity employer and, as a matter of policy, encourages the participation of small businesses that are owned and controlled by minorities and women. Joint ventures are also encouraged where feasible.

NOTICIA PUBLICA: La Comisión de Vivienda de San Diego (SDHC) esta solicitando opiniones públicas sobre su Mudanza al trabajo (MTW). Año fiscal 2024 (julio 1, 2023 - Junio 30, 2024) Plan Anual. El plan propuesto estará disponible para su revisión en el website de SDHC, www.sdhc.org, comenzando Diciembre 29, 2022. Los comentarios deben enviarse antes de las 5pm de Enero 31, 2023, para ser considerados por el personal de SDHC y las autoridades de toma de decisiones en su revisión final del plan propuesto. Envíe comentarios escritos por correo a: Vivienda de San Diego, 1122 Broadway, Suite 300, San Diego, CA. 92101., ó por correo electrónico a nancys@sdhc.org.

TEMA: En su Plan Anual, MTW para el año fiscal 2024 (1 de Julio del 2023-30 de junio de 2024), SDHC describe actividades destinadas a aumentar la eficiencia programática, apoyar la auto-suficiencia para los participantes de asistencia de alquiler y ampliar las opciones de lección de vivienda para familias de bajos ingresos en la Ciudad de San Diego.

SDHC esta solicitando comentarios públicos sobre los cambios propuestos a su iniciativa Path to Success, incluyendo los cambios en las asignaciones médicas, las asignaciones de servicios públicos y la designación de edad del hogar.

AUDIENCIA PUBLICA SDHC llevará a cabo una audiencia pública virtual por videoconferencia sobre el Plan Anual MTW propuesto para el año fiscal 2024 el miércoles 25 de enero de 2023 a las 11 a.m. Se proporcionará información sobre cómo asistir en el sitio web de SDHC, <https://www.sdhc.org/abp-it-us/plans-polocies/mtw-annual-plans/>.

Dates of Public Notice: December 19, 2022 and December 26, 2022 PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION MOVING TO WORK FISCAL YEAR 2024 PLAN

PUBLIC NOTICE

The San Diego Housing Commission (SDHC) is soliciting public comment on its Moving to Work (MTW) Fiscal Year 2024 (July 1, 2023 – June 30, 2024) Annual Plan. The proposed plan will be available for review on SDHC's website, www.sdhc.org, beginning on December 29, 2022. Comments must be submitted by 5 p.m. on January 31, 2023, to be considered by SDHC staff and decision-making authorities in their final review of the proposed plan. Please submit written comments by mail to: Nancy Sa/ Homeless Housing Innovations, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101, or email your comments to nancys@sdhc.org

SUBJECT

In its MTW Annual Plan for Fiscal Year 2024 (July 1, 2023– June 30, 2024), SDHC describes activities intended to increase programmatic efficiencies, support self-sufficiency for rental assistance participants, and expand housing choice options for low-income families in the City of San Diego. SDHC is soliciting public comment on proposed changes to its Path to Success initiative including changes to medical allowances, utility allowances and household age designation.

PUBLIC HEARING

SDHC will hold a virtual public hearing by video conference on the proposed Fiscal Year 2024 MTW Annual Plan on Wednesday, January 25, 2023, at 11 a.m. Information on how to attend will be provided on SDHC's website, <https://www.sdhc.org/about-us/plans-policies/mtw-annual-plans/>.

Aviso de Elaboración – Suplemento al Informe Final de Impacto Ambiental del Programa para el Plan Regional 2021

La Asociación de Gobiernos de San Diego (SANDAG) por sus siglas en inglés, como agencia líder bajo la Ley de Calidad Ambiental de California por sus siglas en inglés (CEQA), preparará un Suplemento al Informe de Impacto Ambiental del Programa Final, por sus siglas en inglés (SEIR) para una enmienda al Plan Regional 2021 (Enmienda).

Las agencias responsables y fideicomisarias, así como otras agencias, organizaciones e individuos interesados, están invitados a proporcionar sus opiniones por escrito sobre el alcance y el contenido de la información ambiental que se abordará en el SEIR. Debido a los límites establecidos por la ley estatal, su respuesta debe enviarse lo antes posible, a más tardar 30 días después de la publicación de este aviso. Envíe sus comentarios antes de las 5:00 p.m. PST del 9 de enero de 2023, por correo postal ó electrónico a: Kirsten Uchitel, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101 ó Kirsten.uchitel@sandag.org incluya el nombre de una persona de contacto.

SANDAG llevará a cabo una reunión pública virtual de alcance el 21 de diciembre de 2022, a las 4 p.m. PST donde las partes interesadas recibirán una breve presentación sobre la Enmienda y tendrán la oportunidad de proporcionar comentarios sobre el alcance y el contenido del análisis ambiental que se incluirá en el SEIR.

Puede encontrar una copia completa del aviso de preparación del SEIR para enmienda e información sobre cómo asistir a la reunión de alcance virtual del 21 de diciembre de 2022 en www.sandag.org



PUBLIC NOTICE – SAN DIEGO VOICE & VIEWPOINT

PUBLIC NOTICE

Dates of Public Notice: December 19, 2022 and December 26, 2022 **PUBLIC NOTICE OF THE SAN DIEGO HOUSING COMMISSION MOVING TO WORK FISCAL YEAR 2024 PLAN**

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SDHC is soliciting public comment on proposed changes to its Path to Success initiative including changes to medical allowances, utility allowances and household age designation. SDHC is also seeking public comment on proposed changes to its Moving Home Initiative to expand program eligibility and other related criteria.

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PUBLIC NOTICE: SAN DIEGO UNION-TRIBUNE

The San Diego Union-Tribune

PROOF OF PUBLICATION

STATE OF CALIFORNIA County of San Diego

The Undersigned, declares under penalty of perjury under the laws of the State of California: That he/she is the resident of the County of San Diego. That he/she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that he/she is not a party to, nor interested in the above entitled matter; that he/she is Chief Clerk for the publisher of

The San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instruction of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

December 19 & 26, 2022

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated in the City of San Diego, California
on this 27th of December 2022

C. Gaza
Cris Gaza

San Diego Union-Tribune
Legal Advertising

Order ID: 7900487
San Diego Housing Commission - CA11465011

PUBLIC NOTICE MOVING TO WORK FISCAL YEAR 2024 PLAN

The San Diego Housing Commission (SDHC) is soliciting public comment on its Moving to Work (MTW) Fiscal Year 2024 (July 1, 2023 – June 30, 2024) Annual Plan. The proposed plan will be available for review on SDHC's website, www.sdhc.org, beginning on December 29, 2022. Comments must be submitted by 5 p.m. on January 31, 2023, to be considered by SDHC staff and decision-making authorities in their final review of the proposed plan. Please submit written comments by mail to: Nancy Sa/Homelless Housing Innovations, San Diego Housing Commission, 1122 Broadway, Suite 300, San Diego, CA 92101, or email your comments to nancys@sdhc.org

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APPENDIX C: LOBBYING DISCLOSURES

DocuSign Envelope ID: 6A7C78E0-CD87-4DE2-A11B-9BD543888E49

DISCLOSURE OF LOBBYING ACTIVITIES

OMB Control Number: 4040-0013

Expiration Date: 2/28/2025

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

1. * Type of Federal Action: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name: San Diego Housing Commission * Street 1: 1122 Broadway, Ste. 300 Street 2: * City: San Diego State: CA: California Zip: 92101 Congressional District, if known: CA-52		
5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:		
6. * Federal Department/Agency: U.S. Department of Housing and Urban Dev	7. * Federal Program Name/Description: Fiscal Year 2024 Moving to Work (MTW) Block Grant CFDA Number, if applicable:	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ 278,822,115.03	
10. a. Name and Address of Lobbying Registrant: Prefix: * First Name: M/A Middle Name: * Last Name: M/A Suffix: * Street 1: Street 2: * City: State: Zip:		
b. Individual Performing Services (Including address if different from No. 10a) Prefix: * First Name: M/A Middle Name: * Last Name: M/A Suffix: * Street 1: Street 2: * City: State: Zip:		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact, upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. * Signature: [Signature] * Name: Prefix: * First Name: Jeff Middle Name: * Last Name: Davis Suffix: Title: Interim President & Chief Executive Officer Telephone No.: Date: 12/13/2022		
Federal Use Only:		STANDARD FORM LLL (REV. 7/1987) Authorized for Local Reproduction



APPENDIX D: NON-MTW RELATED SDHC INFORMATION

HOMEOWNERSHIP OPPORTUNITIES FOR PEOPLE OF COLOR

An expanded, collaborative effort to help more people of color in the San Diego region become homeowners was announced at a September 21, 2022, news conference about a \$7.5 million grant the Wells Fargo Foundation awarded to SDHC, part of the San Diego Homeownership Equity Collaborative.

This grant will support strategies to create 5,000 new homeowners of color in San Diego County by the end of 2025. The strategies include:

- **Preparation:** Preparing a pipeline of eligible buyers of color by expanding programs such as debt reduction, credit repair, credit counseling and homeownership navigation.
- **Products:** Expanding the availability of down payment assistance and low-cost mortgage programs.
- **Partners:** Expanding connections to trained and qualified professionals.
- **Policy:** And expanding research, incentives and policy reforms to increase the housing supply in San Diego.

The San Diego City-County Reinvestment Task Force (RTF) is leading the implementation of the San Diego Homeownership Equity Collaborative's strategies throughout the San Diego region. SDHC and RTF are among the organizations on the San Diego Homeownership Equity Collaborative's Executive Committee.

According to an [Urban Institute study](#) that SDHC commissioned, Latino households represented 19.1 percent of all households in San Diego, but only 13.6 percent of all homeowner households. Black households accounted for 6.1 percent of all San Diego households, but only 3.6 percent of all homeowner households in the City of San Diego.

Homeownership provides households an asset that grows in value, can help pay educational expenses, may be used to help family members buy their own homes, or provides an inheritance for the next generation.

Wells Fargo is working to increase racial equity in homeownership. Nationally, WORTH aims to help create 40,000 new homeowners of color by the end of 2025.



Wealth Opportunities Restored through Homeownership (WORTH) Grant
News Conference
September 21, 2022



COVID-19 HOUSING STABILITY ASSISTANCE PROGRAM

At a time when having a stable place to call home was especially important due to the COVID-19 pandemic, the COVID-19 Housing Stability Assistance Program (HSAP) allayed the concerns of thousands of households in the City of San Diego with low income who found themselves behind on their rent and/or utilities due to or during the pandemic.

Operated and administered by SDHC, HSAP payments totaled more than \$218 million to help more than 18,300 households with low income pay their rent, utilities and other housing-related costs. HSAP essentially concluded as of August 31, 2022. At the program's conclusion, all households that qualified for assistance had received it.

Government, the business community, labor organizations and a variety of community-based organizations came together through extensive collaboration to support this program as a vital resource. For many, this program made the difference between staying in their home and experiencing homelessness.

Federal funding awarded directly to the City of San Diego or through the State of California, as well as State funding, made this program possible. SDHC successfully disbursed funds to assist qualifying households in need as other jurisdictions across the country experienced challenges timely expending federal emergency rent relief funds.

Raising awareness about the program and helping households complete applications and submit documents also required the participation of many diverse community groups. These included 2-1-1 San Diego and community-based organizations with which SDHC contracted to help applicants. Assistance was provided in 20 languages.



Eric, HSAP participant



Laura, HSAP participant

HOUSING INSTABILITY PREVENTION PROGRAM

SDHC launched the Housing Instability Prevention Program (HIPP) in September 2022 to help pay rent and other housing-related expenses for families in the City of San Diego with low income and unstable housing situations, such as those that are facing eviction for nonpayment of rent.

With limited funding, the program can assist approximately 300 households. SDHC identifies potential participants from referrals from 2-1-1 San Diego. Housing Specialists will contact those households to confirm and verify if they qualify for help.

The program pays \$500 per month for up to 24 months for qualifying households in the City of San Diego and helps with housing-related expenses such as security deposits, past-due rent, utilities, application fees or furniture, depending on the family's need. Payments are made directly to the approved vendor, such as the landlord or utility company.

The San Diego City Council on June 13, 2022, approved including \$3,570,000 in the Fiscal Year 2023 budget to fund HIPP as a pilot program.



EMERGENCY HOUSING VOUCHERS

SDHC helped eligible families lease rental homes with new federal Emergency Housing Vouchers more quickly than many other jurisdictions in California and nationwide, achieving a 100 percent lease-up of its allocation of the federal housing vouchers.

SDHC's success in awarding and leasing up these vouchers was featured on a news story published on October 14, 2022, in the Los Angeles Times titled, "[How San Diego achieved surprising success housing homeless people](#)."

Emergency Housing Vouchers help pay rent for people who are experiencing homelessness; are at risk of experiencing homelessness; are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or who recently experienced homelessness and for whom rental assistance will help prevent their homelessness or a high risk of housing instability.

The federal American Rescue Plan Act authorized 70,000 Emergency Housing Vouchers nationwide, of which 480 were awarded to SDHC.

SDHC entered into Memoranda of Understanding (MOU) with the San Diego Regional Continuum of Care and four additional organizations to directly refer households to SDHC for these vouchers. In addition, SDHC collaborates with 17 community service providers for initial and ongoing case management and additional needs-based services for Emergency Housing Voucher households to increase eligibility and lease-up success, as well as facilitate ongoing housing stability.

SDHC also hired full-time staff to serve as housing specialists/navigators in SDHC's Landlord Engagement and Assistance Program (LEAP). These staff members were specifically assigned to Emergency Housing Voucher families, facilitating landlord incentives, housing search services, service provider coordination and rental assistance staff communication.



Jessica and her family, Emergency Housing Voucher participants

NAHRO CONFERENCE IN SAN DIEGO

SDHC was honored to serve as the host agency for the National Association of Housing and Redevelopment Officials (NAHRO) annual conference, held September 22-24, 2022, with the theme "NAHRO Together: Advancing Our Communities."

SDHC's Interim President & CEO Jeff Davis joined San Diego Mayor Todd Gloria, SDHC Chair of the Board of Commissioners Eugene "Mitch" Mitchell, NAHRO President Patricia Wells and NAHRO Chief Executive Officer Mark Thiele at the opening session to welcome attendees to San Diego.

Sessions at the conference included two SDHC presentations: "Successful Strategies for Creating Affordable Housing in a Competitive, High-Cost Market," which also included Wakeland Housing and Development Corporation and People Assisting the

APPENDIX D: NON-MTW RELATED SDHC INFORMATION



Homeless (PATH) San Diego, and “Moving the Needle on Homelessness: The Power of Community,” which included leaders from SDHC’s Homeless Housing Innovations Division and the San Diego Regional Task Force on Homelessness.

SDHC also led a group of conference attendees on a tour of several affordable rental housing developments on which SDHC collaborated with developers and service providers. These properties included projects with permanent supportive housing for people who experienced homelessness.

NAHRO also recognized SDHC with three Awards of Merit at the conference:

- **Affordable Housing: San Diego Housing Commission Accessory Dwelling Unit Development Pilot Program** – Working with its nonprofit affiliate Housing Development Partners (HDP), SDHC built five ADUs in the available yard space of five single-family homes SDHC owns and rents as affordable housing in the City of San Diego. SDHC also detailed key takeaways and lessons learned from this process to provide important information to help San Diego homeowners interested in building ADUs on their properties.
- **Community Revitalization: City of San Diego COVID-19 Housing Stability Assistance Program** – SDHC launched this program to help pay rent and utilities for qualifying households with low income who experienced financial hardship due to or during the pandemic.
- **Administrative Innovation: Online Dashboards for Homelessness Programs and Affordable Housing** – SDHC created these new online dashboards to provide the public and policymakers with important data about affordable housing and homelessness programs in the City of San Diego.



NAHRO Awards of Merit Presented to SDHC



APPENDIX E: CURRENT ALTERNATIVE REASONABLE COST LIMITS

SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

Project References								
PROPERTY NAME	BUILDING	TYPE	HCC (\$)	TDC (\$)	Gross SF	\$/SF HCC	\$/SF TDC	BOARD REPORT
Elevator								
ALPHA LOFTS	ELEVATOR	NEW	\$ 10,020,106	\$ 16,689,662	38,566	\$ 259.82	\$ 432.76	HCR17-010
STELLA	ELEVATOR	NEW	\$ 17,862,896	\$ 25,954,448	59,003	\$ 302.75	\$ 439.88	HCR17-093
ZEPHYR GRANTVILLE VETERANS APARTMENTS	ELEVATOR	REHAB	\$ 9,159,000	\$ 25,665,500	50,960	\$ 179.73	\$ 503.64	HCR17-014
ENCANTO VILLAGE	ELEVATOR	NEW	\$ 14,138,561	\$ 21,888,404	65,400	\$ 216.19	\$ 334.69	HCR17-020
PARK & MARKET	ELEVATOR	NEW	\$174,551,726	\$ 225,494,043	471,444	\$ 370.25	\$ 478.31	HCR17-039
THE BEACON	ELEVATOR	NEW	\$ 10,142,953	\$ 16,735,881	26,166	\$ 387.64	\$ 639.60	HCR17-050
CIVITA II FAMILY	ELEVATOR	NEW	\$ 72,257,767	\$ 99,339,048	185,390	\$ 389.76	\$ 535.84	HAR17-036
LUTHER TOWER	ELEVATOR	REHAB	\$ 11,032,169	\$ 26,172,310	98,000	\$ 112.57	\$ 267.06	HCR17-078
BLUEWATER	ELEVATOR	NEW	\$ 19,870,000	\$ 28,809,500	90,944	\$ 218.49	\$ 316.78	HCR17-083
SAN YSIDRO SENIOR VILLAGE	ELEVATOR	NEW	\$ 8,359,403	\$ 15,399,132	29,610	\$ 282.32	\$ 520.07	HCR18-018
WEST PARK	ELEVATOR	REHAB	\$ 5,009,730	\$ 13,652,049	12,652	\$ 395.96	\$1,079.04	HCR19-003
JAMBOREE	ELEVATOR	NEW	\$ 16,875,089	\$ 30,030,347	66,947	\$ 252.07	\$ 448.57	HCR19-007
TRINITY APARTMENTS	ELEVATOR	NEW	\$ 18,035,060	\$ 29,003,070	43,978	\$ 410.09	\$ 659.49	HCR19-019
SCRIPPS MESA	ELEVATOR	NEW	\$ 79,000,000	\$ 106,840,000	374,261	\$ 211.08	\$ 285.47	HCR19-050
QUALITY INN	ELEVATOR	REHAB	\$ 8,263,233	\$ 11,029,876	23,612	\$ 349.96	\$ 467.13	HCR19-053
EAST BLOCK FAMILY	ELEVATOR	NEW	\$ 28,062,466	\$ 36,131,299	103,708	\$ 270.59	\$ 348.39	HCR19-099
EAST BLOCK SENIORS	ELEVATOR	NEW	\$ 23,160,884	\$ 26,992,957	81,942	\$ 282.65	\$ 329.42	HCR19-056
WESLEY TERRACE	ELEVATOR	REHAB	\$ 13,853,827	\$ 29,254,990	110,000	\$ 125.94	\$ 265.95	HCR19-057
ULRIC STREET	ELEVATOR	NEW	\$ 26,037,629	\$ 41,293,511	98,643	\$ 263.96	\$ 418.62	HCR19-070
COURTHOUSE COMMONS	ELEVATOR	NEW	\$178,800,000	\$ 234,670,000	524,917	\$ 340.63	\$ 447.06	HCR19-077
14TH AND COMMERCIAL APARTMENTS	ELEVATOR	NEW	\$ 87,912,636	\$ 134,853,907	237,174	\$ 370.67	\$ 568.59	HCR19-087
14C VHHP	ELEVATOR	NEW	\$ 23,380,949	\$ 35,434,998	53,481	\$ 437.18	\$ 662.57	HCR19-088
KEELER COURT	ELEVATOR	NEW	\$ 20,650,582	\$ 36,170,233	78,939	\$ 261.60	\$ 458.20	HCR19-089
Walkup								
BELLA VISTA	WALKUP	REHAB	\$ 8,770,116	\$ 39,768,420	137,756	\$ 63.66	\$ 288.69	HCR17-017
NEW PALACE HOTEL	WALKUP	REHAB	\$ 7,943,045	\$ 19,040,849	34,563	\$ 229.81	\$ 550.90	HCR17-018
TOWN & COUNTRY APARTMENTS	WALKUP	REHAB	\$ 13,286,361	\$ 43,074,044	147,785	\$ 89.90	\$ 291.46	HAR17-019
VISTA DEL PUENTE	WALKUP	NEW	\$ 13,522,258	\$ 19,677,147	47,794	\$ 282.93	\$ 411.71	HCR17-031
SAN YSIDRO FAMILY APARTMENTS	WALKUP	NEW	\$ 23,882,816	\$ 38,812,315	130,000	\$ 183.71	\$ 298.56	HAR17-034
REGENCY CENTRE APARTMENTS	WALKUP	REHAB	\$ 9,192,744	\$ 25,955,708	81,500	\$ 112.79	\$ 318.47	HAR17-038
CORONADO TERRACE	WALKUP	REHAB	\$ 25,548,297	\$ 111,579,303	301,428	\$ 84.76	\$ 370.17	HCR17-042
CASA PULETA	WALKUP	REHAB	\$ 1,746,932	\$ 9,391,159	63,226	\$ 27.63	\$ 148.53	HCR17-045
PACIFICA AT PLAYA DEL SOL	WALKUP	NEW	\$ 7,828,483	\$ 14,949,746	48,563	\$ 161.20	\$ 307.84	HCR17-089
HOLLYWOOD PALMS II	WALKUP	REHAB	\$ 8,435,601	\$ 27,990,851	93,413	\$ 90.30	\$ 299.65	HCR17-091
PARKSIDE APARTMENTS	WALKUP	REHAB	\$ 3,106,636	\$ 9,361,632	31,940	\$ 97.26	\$ 293.10	HCR18-052
HILLSIDE VIEWS APARTMENTS	WALKUP	REHAB	\$ 16,736,053	\$ 72,744,661	279,624	\$ 59.85	\$ 260.15	HCR18-083
HARBOR VIEW VILLA APARTMENTS	WALKUP	REHAB	\$ 3,103,340	\$ 12,171,847	58,340	\$ 53.19	\$ 208.64	HCR19-006
IVY APARTMENTS	WALKUP	NEW	\$ 8,309,583	\$ 17,333,831	33,512	\$ 247.96	\$ 517.24	HCR19-017
BENSON APARTMENTS	WALKUP	REHAB	\$ 8,576,357	\$ 22,551,411	26,050	\$ 329.23	\$ 865.70	HCR19-018
MISSION TERRACE APARTMENTS	WALKUP	REHAB	\$ 4,379,505	\$ 18,397,900	103,108	\$ 42.47	\$ 178.43	HCR19-064
MARINER'S VILLAGE	WALKUP	REHAB	\$ 15,013,020	\$ 68,516,724	171,896	\$ 87.34	\$ 398.59	HCR19-090
PARK CREST	WALKUP	REHAB	\$ 5,658,696	\$ 42,542,504	146,222	\$ 38.70	\$ 290.94	HCR19-101
GRANT HEIGHTS / WINONA APARTMENTS	WALKUP	REHAB	\$ 3,160,080	\$ 14,733,294	28,422	\$ 111.18	\$ 518.38	HCR19-103



APPENDIX E: ALTERNATIVE REASONABLE COST LIMITS FOR SAN DIEGO

SUPPORTING DOCUMENTATION: ACTIVITY #2021-1

EFFECTIVE FY 2021

AVERAGE TDC AND HCC		
	AVERAGE TDC PER SQ. FT.	AVERAGE HCC PER SQ. FT.
ELEVATOR	\$474.22	\$290.95
WALKUP	\$358.80	\$125.99

WALKUP COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
HUD	Walkup	81,058	141,852	110,721	193,761	140,175	245,306	184,728	323,274	228,994	400,739	258,078	451,637	286,822	501,938
SDHC	Walkup	62,997	179,399	88,196	251,159	113,395	322,918	151,194	430,557	214,191	538,197	214,191	609,956	239,390	681,716

ELEVATOR COMPARISON

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
HUD	Elevator	91,130	145,807	127,581	204,130	164,033	262,453	218,711	349,938	273,389	437,422	309,841	495,745	346,292	554,068
SDHC	Elevator	145,476	237,112	203,666	331,956	261,856	426,801	349,142	569,068	436,427	711,335	494,618	806,179	552,808	901,024

TDC/HCC TABLE: ACTIVITY #2021-1

SDHC REASONABLE COST LIMITS (APPROVED IN 2021 PLAN)

		0 BED 500 Sq. Ft.		1 BED 700 Sq. Ft.		2 BED 900 Sq. Ft.		3 BED 1200 Sq. Ft.		4 BED 1500 Sq. Ft.		5 BED 1700 Sq. Ft.		6 BED 1900 Sq. Ft.	
		HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC	HCC	TDC
Detached/Semi-Detached		106,855	186,997	138,209	241,866	165,349	289,361	197,097	344,919	232,214	406,374	254,508	445,389	275,393	481,938
Row Homes		92,115	161,200	120,236	210,414	145,667	254,917	177,708	310,990	210,753	368,818	231,788	405,630	251,442	440,023
Walkup		62,997	179,399	88,196	251,159	113,395	322,918	151,194	430,557	214,191	538,197	214,191	609,956	239,390	681,716
Elevator		145,476	237,112	203,666	331,956	261,856	426,801	349,142	569,068	436,427	711,335	494,618	806,179	552,808	901,024



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

July 11, 2023

Mr. Jeff Davis
Interim President and CEO
San Diego Housing Commission
1122 Broadway, Suite 300
San Diego, CA 92101

Re: San Diego Housing Commission FY 2024 Annual MTW Plan Approval

Dear Mr. Davis:

The Department of Housing and Urban Development has completed its review of the San Diego Housing Commission's (SDHC) Annual Moving to Work (MTW) Plan for Fiscal Year 2024, which was initially submitted on April 10, 2023, and resubmitted per HUD's comments on June 12, 2023, and June 27, 2023. I am writing to inform you that the FY 2024 Annual MTW Plan, as submitted on June 27, 2023, is approved.

The Department's approval of this Annual MTW Plan is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act authorized by the MTW Agreement, including local, non-traditional activities in compliance with Notice PIH 2011-45. In providing assistance to families under programs covered by this Plan, SDHC must comply with the rules, standards and policies established in the Plan as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Agreement. Documents relying upon the approved Plan (i.e., Administrative Plan, Admission and Continued Occupancy Policy, etc.) should be updated to reflect those policies. Also, the approved Plan and all required attachments and documents should be available for review and inspection at SDHC's principal office during normal business hours.

Thank you for your continued efforts to implement an effective and meaningful MTW program. Please contact Jeree Turlington, your MTW Coordinator, at 202-402-5270 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "John M. Concannon".

John Concannon
Moving to Work Program Director
Office of Public Housing Investments

cc: Meena Bavan, Los Angeles PIH Field Office

1D-11a LIVED EXPERIENCE SUPPORT LETTER

COVER

Content Includes

Letter – 1 signature

Letter – 2 Signatures

Docusign Signature Page

October 17, 2024

Office of Special Needs Assistance Programs
Assistant Secretary for Community Planning and Development
U.S. Department of Housing and Urban Development
Washington, DC 20410-7000

Dear SNAPS Officials,

We, a working group of Persons with Lived Experience (PLE), are writing to express our support for the Regional Task Force on Homelessness (RTFH)/Continuum of Care (CoC). The RTFH is committed to centering the voices and experiences of those who have experienced homelessness in our region. They have actively recruited board members with diverse lived experiences, reserving specific seats on the CoC Board for PLE individuals. The CoC's Executive Committee includes one PLE member, and the Governance Committee has two. On the Rating and Ranking Committee, two PLE members play a key role in evaluating performance and recommending projects for funding. The Health and Homeless Committee and the Aging Homeless Ad Hoc Committee each have three PLE members, while the Committee addressing homelessness among Black San Diegans also includes three PLE members, one of whom focuses on justice and homelessness. The Evaluation Committee includes two PLE members, and the CoC Board itself has five PLE members among its thirty-three members.

In December 2023, the RTFH hosted a two-day Homelessness Conference for the San Diego CoC, featuring local, state, and national experts. Of the 50 speakers, one-third were individuals with lived experience, ensuring their voices were embedded throughout the event. RTFH also supports Curtis Howard, founder of LIVEX and All of Us or None, in attending national conferences, including those hosted by the National Alliance to End Homelessness (NAEH). Additionally, RTFH advocates for World Homeless Day and the Lived Experience Advisory Group, providing both financial support and public advocacy for their work.

The CoC also provides space for listening sessions with consultants such as Iain De Jong (OrgCode) and Darlene Mathews and Michelle Williams (Equity in Action). These conversations have led to critical recommendations from PLE, which RTFH has incorporated into the Regional Plan and into all projects funded through the NOFO, with a focus on addressing the severe service needs of individuals and families, particularly those in unsheltered populations.

Sincerely,

Signed by:
X *Vanessa Graziano*
B3174348966944F...

Vanessa Graziano

Community Partnership Liason/ Lived Experience Advisor

October 17, 2024

Office of Special Needs Assistance Programs
Assistant Secretary for Community Planning and Development
U.S. Department of Housing and Urban Development
Washington, DC 20410-7000

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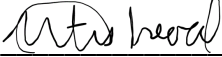
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Sincerely,

X

Kuni Stearns
HEAL Network

DocuSigned by:

X 

3261D94EF41D4E4...
Curtis Howard

LIVEX founder & All of Us- Lead Organizer

DocuSigned by:

X 

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Dennis Larkin

HEAL Network, Lived Experience Advisers

Fwd: Lived experience letters - | X

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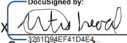
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Open with

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Sincerely,

X _____
Kuni Stearns
HEAL Network

DocuSigned by:
X 
3381696E741D4E4
Curtis Howard
LIVEX founder & All of Us- Lead Organizer

DocuSigned by:
X 
6020AC7C71B158D3
Dennis Larkin
HEAL Network, Lived Experience Advisers

Page 2 / 2

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10/28/2024

1D-2A Housing First Evaluation

COVER

HUD Housing First Assessment Tool

CoC Housing First Document Review Form

Monitoring Report Including Housing First



Housing First Standards Assessment Tool

Overview: This tool aims to assess and document how closely a housing and service provider adheres to the recommended best practice standards of the Housing First model, in the context of the broader work to implement a Housing First orientation at the system-level. This tool specifically evaluates project-level fidelity to Housing First, which directly impacts a system’s fidelity to Housing First. In addition to the universal best practice standards identified in this tool, Continuums should also take into account their local community context and local written standards pertaining to Housing First when assessing projects. A Continuum of Care can use this tool to prompt discussion

Provider Info tab: The Provider Information tab should be completed *prior* to beginning the assessment. Specifically, the *Project Name, Project Type, Target Sub-Population served, and Date of Assessment* fields need to be completed in order to populate the assessment standards and report summary with questions that are specific to the project type and population. Please complete this section prior to printing any standards for assessment.

Standards: The standards have been arranged into the following categories: *Access, Evaluation, Services, Housing, Leases, and Project-Specific*. The “Tab” chart at the bottom of this page describes each of the categories in more detail. Some of the categories are not applicable for all project types, and those standards do not need to be

Project Type	Applicable Standards
Coordinated Entry	Access & Evaluation; Project-specific
Street Outreach	Access & Evaluation; Project-specific
Emergency Shelter	Access & Evaluation; Service & Housing; Project-specific
Transitional Housing	Access & Evaluation; Service & Housing; Leases; Project-specific
Rapid Rehousing	Access & Evaluation; Service & Housing; Leases; Project-specific
Permanent Supportive Housing	Access & Evaluation; Service & Housing; Leases; Project-specific

Safeguarding: Please keep in mind safeguarding concerns when assessing projects. In particular, we advise Continuums of Care to work with projects with victims of domestic violence to make sure that adequate safety and confidentiality policies and practices are in place before beginning assessments.

Scoring: For each standard, there are three scoring criteria: “Say It”, “Document It”, and “Do It” (as explained further below). To show that a project is in full compliance with each standard, the assessor should mark “Always” for each scoring criteria. Use the drop down in the three columns to the right to select “Always” or “Somewhat” or "Not at

- “*Say It*” means that project and agency staff can describe verbally what they do concerning each standard. The assessor should be able to identify that the organizational culture supports the standard by how staff talks about what is done.
- “*Document It*” means that there is written documentation that supports the project’s compliance with each standard. Written documentation could include Policies and Procedures, Personnel Handbooks, Professional Development Plans, Project Rules, etc.

- “*Do It*” means that the assessor was able to find evidence that supports the project’s compliance with each standard. Evidence could include information contained in client or other administrative files, client acknowledgement that something is being done, staff can point to documentation that supports implementation of the standard, etc.

Assessor Notes: A cell below each individual standard allows the assessor to add optional notes about the information collected for that particular standard. The notes can include where information was found, what questions were asked, who answered the questions, what additional information is needed to be able to mark that standard as

Tab	Description	Purpose
Instructions	Tool overview and aim	Offers instruction to users on the assessment tool
Provider Info	Input provider, project and general assessment information	Determines project-specific standards for consideration
Standards - Access & Evaluation	Input compliance with standards concerning participant access to the project and input, project evaluation and performance management	Assesses whether access and evaluation are compliant with Housing First principles
Standards - Leases	Input compliance with standards concerning the lease and occupancy agreements, where applicable	Assesses whether leases and occupancy agreements are compliant with Housing First principles
Standards - Services & Housing	Input compliance with standards concerning the service and housing models and structure, where applicable	Assesses whether services and housing are compliant with Housing First principles
Standards – Project-Specific	Prompts assessment standards based on project type and targeted sub-populations served by the project, where applicable	Assesses whether specific project standards are compliant with Housing First principles
Report Summary	Displays assessment scores and conclusions, and highlights non-compliant standards	Printable summary of the assessment



Provider Information

Please complete the information below on the organization being assessed.

Provider Information	
Provider's Legal Name	[Test Provider]
Acronym (If Applicable)	
Year Incorporated	
EIN	
Street Address	
Zip Code	

Project Information	
Project Name	
Project Budget	
Grant Number	
Name of Project Director	
Project Director Email Address	
Project Director Phone Number	
Which best describes the project *	Rapid Rehousing
<i>If project is a Safe Haven, please choose project type that it most operates like, e.g. shelter, transitional housing, or permanent housing</i>	
Are your services targeted to any of the following populations specifically? Please select one if so, as this impacts your assessment questions.	
People in Recovery	

*Please note that when you select a project type, particular standards may not be relevant.

Management Information	
Name of CEO	
CEO Email Address	
CEO Phone Number	

Name of Staff Member Guiding Assessment	
Staff Email Address	
Staff Phone Number	

Assessment Information	
Name of Assessor	
Organizational Affiliation of Assessor	
Assessor Email Address	
Assessor Phone Number	
Date of Assessment	Nov 02 2016



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

No.	Standard	Access Definition / Evidence	Say It	Document it	Do it
Access 1	Projects are low-barrier	Admission to projects is not contingent on pre-requisites such as abstinence of substances, minimum income requirements, health or mental health history, medication adherence, age, criminal justice history, financial history, completion of treatment, participation in services, “housing readiness,” history or occurrence of victimization, survivor of sexual assault or an affiliated person of such a survivor or other unnecessary conditions unless required by law or funding source. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 2	Projects do not deny assistance for unnecessary reasons	Procedures and oversight demonstrate that staff do everything possible to avoid denying assistance or rejecting an individual or family for the reasons listed in Access Standard #1. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 3	Access regardless of sexual orientation, gender identity, or marital status	Equal access is provided in accordance with the 2012 and 2016 Equal Access Rules, meaning that any project funded by HUD must ensure equal access for persons regardless of one’s sexual orientation or marital status, and in accordance with one’s gender identity. Adult only households, regardless of marital status, should have equal access to projects (if these project types are not available within a CoC, the CoC should conduct an assessment to determine if these project types are needed and work with providers to accommodate the need). Please see Equal Access Rules here: https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/ <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 4	Admission process is expedited with speed and efficiency	Projects have expedited admission processes, to the greatest extent possible, including helping participants obtain documentation required by funding sources, as well as processes to admit participants regardless of the status of their eligibility documentation whenever applicable. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 5	Intake processes are person-centered and flexible	Intake and assessment procedures are focused on the individual’s or family’s strengths, needs, and preferences. Projects do not require specific appointment times, but have flexible intake schedules that ensure access to all households. Assessments are focused on identifying household strengths, resources, as well as identifying barriers to housing that can inform the basis of a housing plan as soon as a person is enrolled in the project.	Please select answer	Please select answer	Please select answer

Optional notes here					
Access 6	The provider/project accepts and makes referrals directly through Coordinated Entry	Projects actively participate in the CoC-designated Coordinated Entry processes as part of streamlined community-wide system access and triage. If these processes are not yet implemented, projects follow communities’ existing referral processes. Referrals from Coordinated Entry are rarely rejected, and only if there is a history of violence, the participant does not want to be in the project, there are legally valid grounds (such as restrictions regarding sex offenders) or some other exceptional circumstance that is well documented.	Please select answer	Please select answer	Please select answer
Optional notes here					
Access 7	Exits to homelessness are avoided	Projects that can no longer serve particular households utilize the coordinated entry process, or the communities’ existing referral processes if coordinated entry processes are not yet implemented, to ensure that those individuals and families have access to other housing and services as desired, and do not become disconnected from services and housing. Households encounter these exits under certain circumstances, such as if they demonstrate violent or harassing behaviors, which are described within agencies’ regulation-adherent policies.	Please select answer	Please select answer	Please select answer
Optional notes here					
Name		Participant Input Definition / Evidence	Say It	Document it	Do it
Participant Input 1	Participant education is ongoing	Project participants receive ongoing education on Housing First principles as well as other service models employed in the project. In the beginning of and throughout tenancy, participants are informed about their full rights and responsibilities as lease holders, including the potential causes for eviction.	Please select answer	Please select answer	Please select answer
Optional notes here					
Participant Input 2	Projects create regular, formal opportunities for participants to offer input	Input is welcomed regarding the project’s policies, processes, procedures, and practices. Opportunities include involvement in: quality assurance and evaluation processes, a participant leadership/advisory board, processes to formally communicate with landlords, the design of and participation in surveys and focus groups, planning social gatherings, integrating peer specialists and peer-facilitated support groups to compliment professional services.	Please select answer	Please select answer	Please select answer
Optional notes here					



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

Standard		Lease and Occupancy Definition / Evidence	Say It	Document It	Do It
Leases 1	Housing is considered permanent (not applicable for Transitional Housing)	Housing is not time-limited (though rent assistance may be) and leases are automatically renewable upon expiration, except with prior notice by either party. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 2	Participant choice is fundamental	A participant has, at minimum, choices in deciding the location and type of housing based on preferences from a range of housing types and among multiple units, as available and as practical. In project-based settings, participants should be offered choice of units within a particular building, or within the portfolio of single site properties. In projects that use shared housing, i.e. housing with unrelated roommates, participants should be offered choice of roommates, as available and as practical. Additionally, as applicable, participants are able to choose their roommates when sharing a room or unit. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 3	Leases are the same for participants as for other tenants	Leases do not have any provisions that would not be found in leases held by any other tenant in the property or building and is renewable per the participants’ and owner’s choice. People experiencing homelessness who receive help moving into permanent housing should have leases that confer the full rights, responsibilities, and legal protections under Federal, state, and local housing laws. For transitional housing, there may be limitations on length of stay, but a lease/occupancy agreement should look like a lease that a person would have in the normal rental market. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 4	Participants receive education about their lease or occupancy agreement terms	Participants are also given access to legal assistance and encouraged to exercise their full legal rights and responsibilities. Landlords and providers abide by their legally-defined roles and responsibilities. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 5	Measures are used to prevent eviction	Property or building management, with services support, incorporates a culture of eviction avoidance, reinforced through practices and policies that prevent lease violations and evictions among participants, and evict participants only when they are a threat to self or others. Clear eviction appeal processes and due process is provided for all participants. Lease bifurcation is allowed so that a tenant or lawful occupant who is a victim of a criminal act of physical violence committed against them by another tenant or lawful occupant is not evicted, removed or penalized if the other is evicted.	Please select answer	Please select answer	Please select answer

Optional notes here					
Leases 6	Providing stable housing is a priority	Providers engage in a continued effort to hold housing for participants, even if they leave their housing for short periods due to treatment, illness, or any other temporary stay outside of the unit.	Please select answer	Please select answer	Please select answer
Optional notes here					
Leases 7	Rent payment policies respond to tenants' needs (as applicable)	While tenants are accountable to the rental agreement, adjustments may be needed on a case by case basis. As necessary, participants are given special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.	Please select answer	Please select answer	Please select answer
Optional notes here					



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

Standard		Services Definition / Evidence	Say it	Document it	Do it
Services 1	Projects promote participant choice in services	Participants are able to choose from an array of services. Services offered are housing focused and include the following areas of support: employment and income, childhood and education, community connection, and stabilization to maintain housing. These should be provided by linking to community-based services.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 2	Person Centered Planning is a guiding principle of the service planning process	Person-centered Planning is a guiding principle of the service planning process	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 3	Service support is as permanent as the housing	Service connections are permanently available and accessible for participants in Permanent Supportive Housing. Rapid Re-Housing projects should, at a minimum, be prepared to offer services for up to 6 months after the rental assistance ends. In emergency shelter and transitional housing, services are available as long as the participant resides in the unit or bed – and up to 6 months following exit from transitional housing.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 4	Services are continued despite change in housing status or placement	Wherever possible, participants continue to be offered services even if they lose their housing unit or bed (for congregate projects), or if they are placed in a short-term inpatient treatment. Ideally, the service relationship should continue, despite a service hiatus during some institutional stays.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 5	Participant engagement is a core component of service delivery	Staff provide effective services by developing relationships with participants that provide immediate needs and safety, develop trust and common ground, making warm hand-offs to other mainstream service providers, and clearly explain staff roles. Engagement is regular and relationships are developed over time.	Please select answer	Please select answer	Please select answer

Optional notes here					
Services 6	Services are culturally appropriate with translation services available, as needed	Project staff are sensitive to and support the cultural aspects of diverse households. Wherever possible, staff demographics reflect the participant population they serve in order to provide appropriate, culturally-specific services. Translation services are provided when needed to ensure full comprehension of the project. Projects that serve families with children should have family-friendly rules that allow for different schedules based on work and school hours and have services that allow parents to participate in activities without having to constantly supervise their children themselves (i.e. can use the bathroom or take a shower without their children being in the bathroom with them).	Please select answer	Please select answer	Please select answer
Optional notes here					
Services 7	Staff are trained in clinical and non-clinical strategies (including harm reduction, motivational interviewing, trauma-informed approaches, strength-based)	Services support a participant’s ability to obtain and retain housing regardless of changes in behavior. Services are informed by a harm-reduction philosophy, such as recognizing that substance use and addiction are a part of some participants’ lives. Participants are engaged in non-judgmental communication regarding their behavior and are offered education regarding how to avoid risky behaviors and engage in safer practices.	Please select answer	Please select answer	Please select answer
Optional notes here					
Standard		Housing Definition / Evidence	Say It	Document It	Do It
Housing 1	Housing is not dependent on participation in services	Participation in permanent and temporary housing settings, as well as crisis settings such as emergency shelter, is not contingent on participating in supportive services or demonstration of progress made on a service plan. Services must be offered by staff, but are voluntary for participants.	Please select answer	Please select answer	Please select answer
Optional notes here					
Housing 2	Substance use is not a reason for termination	Participants are only terminated from the project for violations in the lease or occupancy agreements, as applicable. Occupancy agreements or an addendum to the lease do not include conditions around substance use or participation in services. If the project is a recovery housing model focused on people who are in early recovery from drugs or alcohol (as outlined in HUD’s Recovery Housing Brief), different standards related to use and subsequent offer of treatment may apply. See HUD’s Recovery Housing brief here: https://www.hudexchange.info/resource/4852/recovery-housing-policy-brief/	Please select answer	Please select answer	Please select answer
Optional notes here					
Housing 3	The rules and regulations of the project are centered on participants’ rights	Project staff have realistic expectations and policies. Rules and regulations are designed to support safe and stable communities and should never interfere with a life in the community. Participants have access to the project at all hours (except for nightly in and out shelter) and accommodation is made for pets.	Please select answer	Please select answer	Please select answer

Optional notes here					
Housing 4	Participants have the option to transfer to another project	Transfers should be accommodated for tenants who reasonably believe that they are threatened with imminent harm from further violence if the tenant remains in the same unit. Whenever possible, transfers occur before a participant experiences homelessness.	Please select answer	Please select answer	Please select answer
Optional notes here					



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

	Standard	Project -Specific Standards	Say It	Document it	Do it
Project 1	Quick access to RRH assistance	A Rapid Re-housing project ensures quick linkage to rapid re-housing assistance, based on participant choice. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Project 2	RRH services support people in maintaining their housing	Participants and staff understand that a primary goal of rapid re-housing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of perceived barriers. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Project 3	Providers continuously assess a participant’s need for assistance	On an ongoing basis, providers assess a participant’s needs for continued assistance and provide tailored assistance based on those assessments. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
		No additional standards <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
		No additional standards <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer

No additional standards					
Optional notes here					
No additional standards					
Optional notes here					
No additional standards					
Optional notes here					
Standard		Population Specific Standards	Say It	Document It	Do It
Population 1	Recovery housing is offered as one choice among other housing opportunities	Connection to recovery housing reflects individual choice for this path toward recovery. Abstinence-only spaces are incorporated into a Housing First model wherever possible, thus providing this type of recovery option to those who choose it. Recovery supports are offered, particularly connections to community-based treatment options.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Population 2	Services include relapse support	Housing and services include relapse support that does not automatically evict or discharge a participant from the project for temporary relapse. Relapse support might include referrals to outpatient treatment or direct provision of outpatient services or the ability to hold a unit for a certain period of time (30-90 days) while the participant undergoes residential treatment.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Population 3	Services support sustained recovery	Recovery housing projects provide services that align with participants' choice and prioritization of recovery, including but not limited to abstinence from substances (if that is a personal goal), long-term permanent housing stability, and stable income through employment or benefits. Support is offered through connections to community-based treatment options.	Please select answer	Please select answer	Please select answer

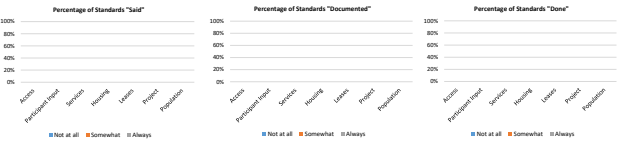
Optional notes here	
Population	No additional standards
Optional notes here	



Some standards have not been evaluated. Please return and complete all standards before finalising report.

Your score: 0
Max potential score: 238

Score is calculated by awarding 1 point for standards answered 'sometimes' and 2 points for standards answered 'always'. Categories that are not applicable for your project are not included in the maximum potential score.



Non-Compliant Standards ("Not at All" to Whether Standard is Satisfactory)				Non-Documented Standards ("Not at All" to Whether Standard is Documented)				Non-Existent Standards ("Not at All" to Whether Standard is Done")			
Category	No.	Name	Standard	Category	No.	Name	Standard	Category	No.	Name	Standard

Example	Document	Findings	N	Name	Standard	Category	Notes	Not at all	Not at all	Not at all	Order of columns: Non-compliant (G-9) Non-compliant (J-1) Non-compliant (K-2)
Phase select answer	Phase select answer	Phase select answer	1	Proprietary low barrier	Substance to projects is not contingent on pre-requisites such as abstinence of substances, minimum income requirements, health or mental health history, medication adherence, age, criminal justice history, etc.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Proprietary do not deny assistance for unnecessary reasons	Procedures and oversight demonstrate that staff do everything possible to avoid denying assistance or rejecting an individual or family for the reasons listed in Access Standard #1.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Access regardless of sexual orientation, gender identity, etc.	A rapid access is provided in accordance with the 2012 and 2016 Equal Access Rules, meaning that no project funded by HRID must create equal access for persons regardless of one's sexual orientation.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Admission process is expedited with speed and efficiency	Projects have expedited admission processes, to the greatest extent possible, including helping participants obtain documentation required by funding sources, as well as processes to admit participants.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	Intake processes are person-centered and flexible	Intake and assessment procedures are focused on the individual's or family's strengths, needs, and preferences. Projects do not require specific appointment times, but have flexible intake schedules.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	The provider/project accepts and makes referrals directly	Providers/projects accept participants in the CoC-designated Coordinated Entry process as part of its standard community-wide system access and intake. If these processes are not yet implemented, projects	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	Entry to households are avoided	Projects that are no longer serve particular households unless the coordinated entry process, or the community's existing related process of coordinated entry processes are not yet implemented.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Participant education is ongoing	Project participants receive ongoing education on Housing First principles as well as other services made available in the project. In the beginning of and throughout tenancy, participants are informed.	Participant In	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Proprietary create regular, formal opportunities for participation	Input is solicited regarding the project's policies, processes, procedures, and practices. Opportunities include involvement in quality assurance and evaluation processes, a participant leadership role.	Participant In	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Participant are able to choose from an array of services	Services offered are housing focused and include the following areas of support: employment and income, child/child and education, community	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Participant are able to choose from an array of services	Services offered are housing focused and include the following areas of support: employment and income, child/child and education, community	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	Service support is as permanent as the housing	Service assistance is permanently available and accessible for participants in Permanent Supportive Housing. Rapid Re-Housing projects should, at a minimum, be prepared to offer services for up	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	Services are continued despite change in housing status or if	Wherever possible, participants continue to be offered services even if they lose their housing unit or fail (for co-occurring projects), or if they are placed in a short-term supportive treatment. Ideally, the	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	Participant engagement is a core component of service delivery	Staff provide effective services by developing relationships with participants that provide immediate needs and safety, develop trust and common ground, making warm hand-offs to other mainstream	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	8	Services are culturally appropriate with translation services	Projects staff are sensitive to and support the cultural aspects of diverse households. Wherever possible, staff demographics reflect the participant population they serve in order to provide appropriate	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	9	Staff are trained in clinical and non-clinical strategies (include)	Services support a participant's ability to obtain and retain housing regardless of changes in behavior. Services are informed by a harm reduction philosophy, such as recognizing that substance use and	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Housing is not dependent on participation in services	Participation in permanent and temporary housing settings, as well as other settings such as emergency shelter, is not contingent on participating in supportive services or demonstration of progress in	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Substance use is not a reason for termination	Participant are only terminated from the project for violations in the lease or occupancy agreements, as applicable. Occupancy agreements or an addendum to the lease do not include conditions on	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	The rules and regulations of the project are centered on	Projects and rules/regulations are designed to support safe and stable communities and should never interfere with a life in the community. Participants for	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Participants have the option to transfer to another project	Transfers should be accommodated for tenants who reasonably believe that they are threatened with imminent harm from further violence if the tenant remains in the same unit. Wherever possible, the	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	Housing is considered permanent (not applicable for Trans)	Housing is not time-limited (though rent assistance may be) and leases are automatically renewable upon expiration, except with prior notice by either party.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	Participant choice is fundamental	A participant has, at minimum, choices in deciding the location and type of housing based on preferences from a range of housing types and among multiple units, as available and as practical. In partic	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	Leases are the same for participants as for other tenants	Leases do not have any provisions that would not be found in leases held by any other tenant in the property or building and to ensure this part the participants' and owner's choice. People experiencing	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	8	Participants receive education about their lease or occupancy	Participants are also given access to legal assistance and encouraged to exercise their full legal rights and responsibilities. Landlords and providers abide by their legally-defined roles and responsibilities.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	9	Measures are used to prevent evictions	Projects or building management, with services support, incorporates a culture of eviction avoidance, mediated through practices and policies that prevent lease violations and evictions among partic	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	10	Providing stable housing is a priority	Providers engage in a continued effort to hold housing for participants, even if they have their housing for short periods due to treatment, illness, or any other temporary stay outside of the unit.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	11	Quick access to RRI assistance	A rapid Re-housing project creates quick linkage to rapid re-housing assistance, based on participant choice.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	12	RRI services support people in maintaining their housing	Participants and staff understand that a primary goal of rapid re-housing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of persistence of barriers.	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	13	Providers continuously assess a participant's need for assistance	On an ongoing basis, providers assess a participant's needs for continued assistance and provide tailored assistance based on those assessments.	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	14	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	15	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	16	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	17	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	18	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	19	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	20	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	21	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	22	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	23	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	24	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	25	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	26	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	27	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	28	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	29	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	30	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	31	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	32	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	33	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	34	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	35	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	36	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	37	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	38	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	39	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	40	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	41	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	42	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	43	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	44	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	45	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	46	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	47	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	48	No additional standards	No additional standards	Project speed	Optional notes here	0			
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Phase select answer	Phase select answer	Phase select answer	99	No additional standards	No additional standards	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	100	No additional standards	No additional standards	Project speed	Optional notes here	0			



This page does not comprise part of the assessment. It is for information only.

Numbers	Access			Participant Input			Services			Housing			Leases			Project-specific			Population		
	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always
Please select answer	21			6			21			12			21			9			9		
Say it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Document it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Do it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Checks	-			-			-			-			-			-			-		

Percentages	Access			Participant Input			Services			Housing			Leases			Project-specific			Population		
	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always
Please select answer	300%			300%			300%			300%			300%			300%			300%		
Say it	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Document it	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Do it	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Number of standards	7			2			7			4			7			3			3		

'Say It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	0%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	0%	0%	0%	0%	0%	0%	0%
Check	-						

'Document It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	0%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	0%	0%	0%	0%	0%	0%	0%
Check	-						

'Do It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	0%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	0%	0%	0%	0%	0%	0%	0%
Check	-						

Supportive Housing Standards Rating		Pointer	
Start	0	Value	0
Initial	15	Pointer	3
Middle	45	End	198
End	40		
Max	100		

Score: 0

Standard Numbers	With special pop	Without special pop
Coordinated entry	15	12
Street outreach	15	12
Emergency shelter	26	23
Transitional housing	33	30
Rapid rehousing	33	30
Permanent supportive housing	33	30

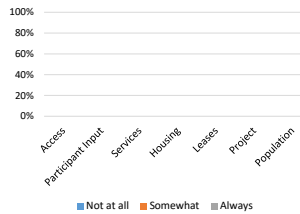
Max answer score (for 'always') 6 3 categories (say, document, do) x 2 max points for 'always'

Answer Numbers	With special pop	Without special pop
Coordinated entry	90	72
Street outreach	90	72
Emergency shelter	156	138
Transitional housing	198	180
Rapid rehousing	198	180
Permanent supportive housing	198	180

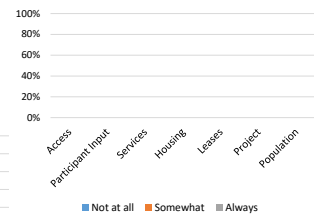
Project type Rapid Rehousing 3
Special population People in Recovery 1

Evaluation max score 198

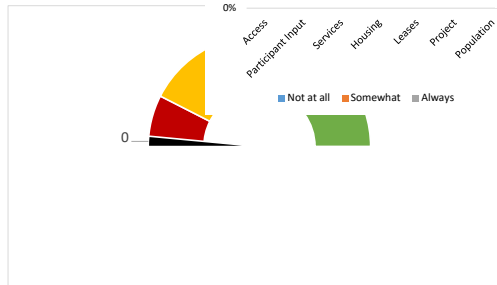
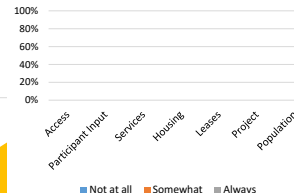
"Say It" Standards, by Category and Response



"Do It" Standards, by Category and Response



"Document It" Standards, by Category and Response





Assumptions for the standards

This page does not comprise part of the assessment. It is for information only.

Project standards

Standards	Coordinated Entry	Street Outreach	Emergency Shelter	Transitional Housing	Rapid Rehousing	Permanent Supportive Housing	Joint Transitional Housing & Rapid Rehousing
Title	Coordinated Entry does not screen people out for perceived barriers	Projects screen for health and safety needs	Focus of emergency shelter is on safe and responsive temporary shelter	Quick access to TH assistance	Quick access to RRH assistance	Quick access to PSH assistance	Quick access to RRH assistance
Project 1	Coordinated Entry does not screen people out for assistance due to perceived barriers related to housing or services, including, but not limited to, too little or no income, active or a history of substance use, domestic violence history, minimal linkage to other services, the type or extent of disability-related services or supports that are needed, or criminal justice history.	Outreach projects screen people contacted through outreach as soon as possible for critical health and safety needs, providing immediate response to people with the most severe needs.	Participants and staff understand that the primary goal of the emergency shelter are to provide temporary accommodation that is safe, respectful, and responsive to individual needs and that participants are offered permanent housing as quickly as possible, regardless of perceived barriers.	A transitional housing project ensures quick linkage to a unit and services based on participant choice.	A Rapid Rehousing project ensures quick linkage to rapid rehousing assistance, based on participant choice.	A permanent supportive housing project ensures quick linkage to a unit and wrap-around services, based on participant needs, preferences, and resource availability.	A Rapid Rehousing project ensures quick linkage to rapid rehousing assistance, based on participant choice.
	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required
Title	Process to assess project-level policies and alert CoC	Street outreach projects are focused on providing access to housing and services	Housing comes first	Transitional housing is focused on safe and quick transitions to permanent housing	RRH services support people in maintaining their housing	PSH is focused on ending homelessness for those with the most severe barriers to maintaining housing	RRH services support people in maintaining their housing
Project 2	Written policies and procedures exist to determine which projects have project-level policies that screen out "high barrier" households, and the steps that the coordinated entry provider will take to alert the CoC of these projects, thereby enabling the CoC to take steps to assist these projects in adopting Housing First principles.	Participants and staff understand that the primary goal of street outreach are to provide access to temporary housing and services and/or rehousing participants in permanent housing as quickly as possible, regardless of perceived barriers. Street outreach project first enter an emergency shelter if the low-barrier orientation of the Coordinated Entry process.	If a temporary shelter placement is made, assessment and planning for permanent housing placement begins as quickly as possible. People who are unsheltered are not required to first enter an emergency shelter in order to access permanent housing placement assistance and enter permanent housing.	Participants and staff understand that the primary goal of transitional housing are to provide temporary accommodations that are safe, respectful, and responsive to individual needs, address the service needs of participants, and re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns, and as desired by the participant. Participation in transitional housing services does not inhibit participants from moving to permanent housing when they choose to. Assessment and planning for permanent housing placement begins as soon as the individual or family expresses a desire to transition to permanent housing.	Participants and staff understand that a primary goal of rapid rehousing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of perceived barriers.	Participants and staff understand that a primary goal of permanent supportive housing is to end homelessness for people with the most severe service needs and help participants stay housed, regardless of other perceived barriers.	Participants and staff understand that a primary goal of rapid rehousing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of perceived barriers.
	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required
Title	RRH as a bridge to permanent supportive housing	Coordinated Entry is linked to Street Outreach	TH projects provide appropriate services	Providers continuously assess a participant's need for assistance	Property Management duties are separate and distinct from services/case management	Providers continuously assess a participant's need for assistance	
Project 3	Rapid Re-Housing is made available to serve as a bridge to other permanent housing options so that persons with high service needs or vulnerabilities can be housed more quickly. (See HUD's Rapid Re-Housing Brief here: https://www.hudexchange.info/resources/documents/Rapid-Re-Housing-Brief.pdf)	Written policy and procedures detail a process by which street outreach staff ensure that persons encountered on the streets are offered the same standardized processes as persons assessed through site-based assessment. Outreach teams are coordinated, trained, and have the ability to engage and quickly connect people experiencing homelessness to the local coordinated entry process in order to apply for and obtain permanent housing. Based on the CoC's decision about how street outreach is incorporated into the assessment process, street outreach projects must comply with the CoC's decision.	No additional standards	TH projects provide appropriate services to meet the participants health and safety needs (e.g., persons in early recovery domestic violence survivors, those who need special accommodations) when there are no permanent housing solutions available (with or without supportive services) or when the participant chooses transitional housing. Services are not required in order to participate in housing.	In order to provide clear roles of staff for participants in terms of lease and rules enforcement as well as tenant advocacy, property management and service provider staff should be separate roles. However, they should work together on a regular basis through regular communication and meetings regarding Participants to address tenancy issues in order to preserve tenancy.	On an ongoing basis, providers assess a participant's needs for continued assistance and provide tailored assistance based on these assessments.	On an ongoing basis, providers assess a participant's needs for continued assistance and provide tailored assistance based on these assessments.
	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required
Title		Street outreach continuously engages those experiencing homelessness and on the street	Housing comes first	Transitional housing is focused on safe and quick transitions to permanent housing	Participants and staff understand that the primary goal of transitional housing are to provide temporary accommodations that are safe, respectful, and responsive to individual needs, address the service needs of participants, and re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns, and as desired by the participant. Participation in transitional housing services does not inhibit participants from moving to permanent housing when they choose to. Assessment and planning for permanent housing placement begins as soon as the individual or family expresses a desire to transition to permanent housing.		
Project 4	No additional standards	Through continuous engagement strategies, a street outreach project provides quick linkage to housing and services when a person is ready to engage.	No additional standards	No individuals or families, including those who are unsheltered, are required to enter a transitional housing project in order to access permanent housing placement assistance and enter permanent housing.	No additional standards	No additional standards	
				Type notes here, if required		Type notes here, if required	
Title		Street Outreach engagements inform the community's efforts to improve their crisis response system				TH projects provide appropriate services	
Project 5	No additional standards	Communities use street outreach engagements with those on the street and to encourage them to understand and remove barriers to those accessing the crisis response system.	No additional standards	No additional standards	No additional standards	No additional standards	TH projects provide appropriate services to meet the participants health and safety needs (e.g., persons in early recovery domestic violence survivors, those who need special accommodations) when there are no permanent housing solutions available (with or without supportive services) or when the participant chooses transitional housing. Services are not required in order to participate in housing.
		Type notes here, if required					Type notes here, if required
Title							
Project 6	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards
Title							
Project 7	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards

Project standards

Standards	Youth and Young Adults	People in Recovery	Domestic Violence Survivors	None of the above
Title	Services are offered	Recovery housing is offered as one choice among other housing opportunities	Participant safety is a priority at all points of engagement and in all planning processes	
Population 1	Services are focused on ensuring that youth transition to independence.	Connection to recovery housing reflects individual choice for this path toward recovery. Distress-only spaces are incorporated into a Housing First model wherever possible, thus providing this type of recovery option to those who choose it. Recovery supports are offered, particularly connections to community-based treatment options.	Lead by the survivor, a safety plan is developed that includes an assessment of danger, particular points of vulnerability, and best approaches to increasing safety.	
	Type notes here, if required	Type notes here, if required	Type notes here, if required	
Title	Projects include positive youth development principles	Services include relapse support	Survivor-driven advocacy is available	
Population 2	Youth projects should include positive youth development orientation. Positive youth development builds on strengths and resilience. By focusing on strengths and assets, rather than what might be "wrong," youth are empowered and are equipped to make positive decisions.	Housing and services include relapse support that does not automatically exist or discharge a participant from the project for temporary relapse. Relapse support might include referrals to outpatient treatment or direct provision of outpatient services or the ability to hold a unit for a certain period of time (30-90 days) while the participant undergoes residential treatment.	The unique needs and strengths of each individual survivor and their children are taken into account with regard to the types of services that are available and offered. Project uses flexible and survivor-focused approaches to overcome barriers survivors may face in accessing services through traditional models.	
	Type notes here, if required	Type notes here, if required	Type notes here, if required	
Title	Staff use harm reduction practices and approaches	Services support sustained recovery	Housing stability is a priority	
Population 3	Youth models employ a harm reduction and recovery orientation, including those developed for youth and young adults with substance use and additional. Projects may make substance-based models available for youth and young adults; however, the choice should be with the participant, not with the project.	Recovery housing projects provide services that align with participants' choice and prioritization of recovery, including but not limited to: abstinence from substances (if that is a personal goal), long-term permanent housing, stability, and stable income through employment or benefits. Support is offered through connections to community-based treatment options.	Providers support survivors and their children to retain or obtain safe, stable housing. Survivors choose the type of housing and location of housing. Housing is located in an area that is considered safe from the abusive relationships.	
	Type notes here, if required	Type notes here, if required	Type notes here, if required	
Title	Project design accounts for the age of youth and young adults to be served			
Population 4	Developmentally appropriate project design ensures that project entry and on-going participation is not predicated on behaviors or experiences that youth and young adults may not currently have or if they were older would not result in consequences. For example, projects should accept and allow continued participation for youth who do not have income or immediate prospects of income because their age has not allowed them the opportunity to gain employment.	No additional standards	No additional standards	
	Type notes here, if required			

[illegible]



HOUSING FIRST REQUIREMENTS

Description

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold) and does not terminate program participants from the project for lack of participation in the program (e.g., supportive service participation requirements or rules beyond normal tenancy rules).

HOUSING FIRST REVIEW CHECKLIST

Name: _____

Project Name(s): _____

Documents Provided

Each organization is asked to provide evidence of how they implement Housing First in their projects. Use this checklist to indicate the type of forms that were provided for your review:

- ☐ Program Policies and Procedures
- ☐ Program Intake form
- ☐ Notices to clients (Participant Handbook, Program Rules, and Expectations, etc.)
- ☐ Termination Policy
- ☐ Sample lease agreements (PSH programs)

Other: Identify _____



☐ does not terminate for failure to make progress on a service plan;

☐ does not terminate for loss of income or failure to improve income; and

☐ does not terminate for other activities not covered in a lease agreement

Reviewer Notes:

Policies show ---

RESULTS OF REVIEW

☒ Housing First Validated: (All conditions met):

☐ Housing First Integrity documents need the following minimal corrections (e.g. no mention of a specific item needed):

Reviewer Notes:

Implementation:

Last Update:

☐ Housing First Integrity not evidenced in documents:



Check if the statement is accurate:

Housing First: Specific Conditions at Entry

☐ does not require a minimum level of income at entry

☐ does not screen out for substance use

☐ does not screen out for criminal record except as mandated by the state (manufacture/sales of illegal substances in past 5 years, conditions related to registered sex offender)

☐ does not screen out persons with a history of victimization (DV, assault, abuse)

Reviewer Notes:

Note: Evaluation CoC funded program.

Conditions Related to Termination of Housing

☐ does not require additional steps (e.g., a required stay in transitional housing or a certain number of days of sobriety) when program participants determine that they want assistance moving into permanent housing.

☐ does not terminate housing for failure to participate in supportive services—not including case management that is for the purposes of engagement only;



Review Date: 2/8/2024

Reviewer Initials: AMV

2024 Desk Audit Tool

Contact Information

1. Your Name:

2. Your Title:

3. Your Email:

4. Your Phone Number:

5. Agency
Name:

6. List all CoC funded Project
Names:

1. The agency has the HMIS Standard Agency Privacy Practice Notice posted on agency website.

Monitors will check to see that the agency's website has the most up to date version of the Privacy Notice posted to the agency website.

Please provide a direct link to the posting on your agency's website:

2. The agency is able to provide a list of all the HMIS users at the agency that have completed the HMIS training.

Monitors will run a report of current HMIS users at the agency and compare it with the list the agency provides.

Browse...

Staff Training and Support

3. Does your agency have a policy regarding professional development?

If so, please upload the policy.

Browse...

4. Does your agency have a system for tracking staff training attendance, such as a training spreadsheet, log or tracker?

If so, please upload a completed version.

Browse...

5. Please describe how the agency provides staff with training opportunities in the following subject areas. Please indicate whether opportunities are available to new staff, existing staff, or both. Please also note whether the opportunities are internal or external, and the frequency.

A) Diversity training: may include topics such as race, cultural, religion, sexual orientation, gender, age, etc.

A large, empty rectangular text box with a thin gray border, intended for the user to describe diversity training opportunities.

B) Best practices and evidence-base practice models: may include topics such as housing first, harm reduction, motivational interviewing, trauma-informed care, etc.

A large, empty rectangular text box with a thin gray border, intended for the user to describe best practices and evidence-based practice models.

C) Homelessness: may include housing first, HUD's definitions of homelessness, HUD's chronically homeless definition, and San Diego's Continuum of Care, etc.

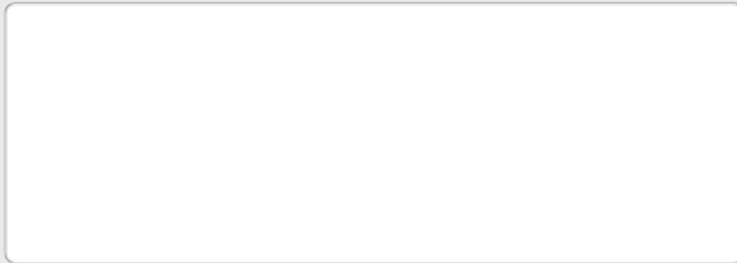
D) Other – Please explain:

If it is possible to upload evidence/documentation of the implementation of the methods you described for providing training opportunities to staff, please upload the files here. Examples of evidence/documentation may include training logs or trackers, training announcements shared with staff, sign-in sheets, certificates of attendance, or other documents. If you already uploaded a training tracker spreadsheet with question #4, you do not have to re-submit that or submit additional documentation.

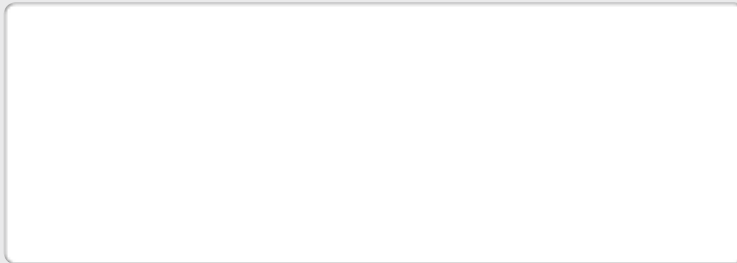
Browse...

6. Please describe how the agency helps participants meet unique needs, whether by meeting the needs internally, referring to an outside source (if so, indicate the referral source/linkage agreement), or if a staff person has responsibility for seeking resources as needs arise.

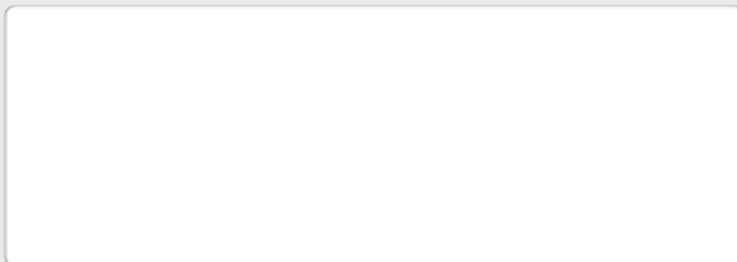
A) Psychosocial barriers (i.e. substance use counseling, psychiatric services, etc.)

A large, empty rectangular box with a thin gray border, intended for the user to provide details about psychosocial barriers and how the agency addresses them.

B) Physical disabilities

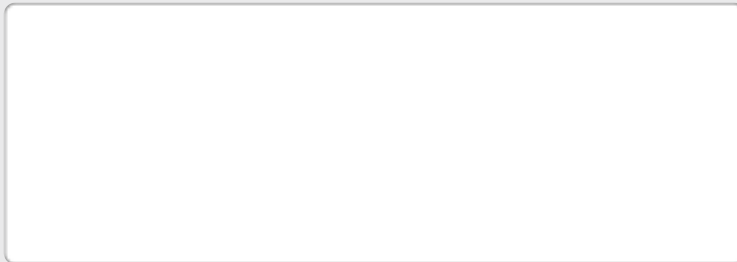
A large, empty rectangular box with a thin gray border, intended for the user to provide details about physical disabilities and how the agency addresses them.

C) Communication barriers (i.e., interpreter, bilingual materials, Braille materials, Text Telephone - TTY/TDD)

A large, empty rectangular box with a thin gray border, intended for the user to provide details about communication barriers and how the agency addresses them.

7. Please describe how the agency shares informational resources with the program participants to affirmatively further fair housing and upload resource documents.

Monitors will verify that the resources include information about who is protected, what actions are prohibited, how to file a complaint, and how to contact local fair housing enforcement agencies. For transitional housing projects, the program has resources for participants to utilize when searching for permanent housing.

A large, empty rectangular box with a thin gray border, intended for the user to describe how the agency shares informational resources.

Upload the fair housing document(s) here. Documentation may include brochures, pamphlets, fliers, training materials, etc.

Browse...

8. Please submit the menu and variety of services available to program participants.

Monitors will verify that the project makes a variety of services available to meet the range of possible service needs that the program's population may have.

Upload the menu of services.

Browse...

9. Please describe how the project conducts an annual assessment of the service needs of the program participants and adjusts services accordingly. Monitors will verify that the process includes assessment of receipt and renewal of mainstream benefits, access to health care, and a range of other possible service needs.

A large, empty rectangular box with a thin gray border, intended for the user to provide a detailed description of the annual assessment process.

Upload the documentation demonstrating annual assessment of service needs, such as an annual assessment template or policy/procedure for completing annual assessments. Other documentation may be acceptable.

Browse...

10. For projects that serve families, the project is able to describe and/or provide a policy or procedure to support how staff ensures the following:

A) Families with children under 18 are not separated or denied admission into housing

B) Children are enrolled in school or preschool and families are provided guidance and support in doing so

C) Families enrolled in transitional housing projects are connected to the Public Schools

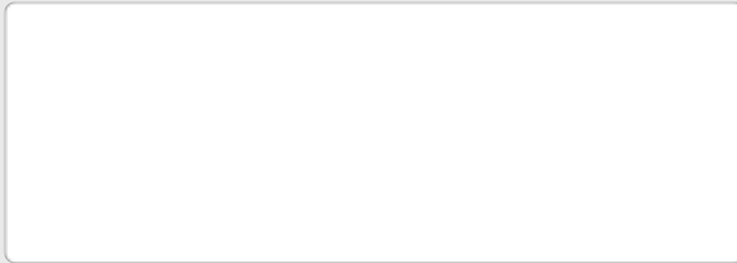
D) The project's case management model includes developmentally appropriate service planning for each member of the family

E) Children have access to developmental screening

F) Families are assisted with accessing child-care

G) The project assesses and monitors the health of children

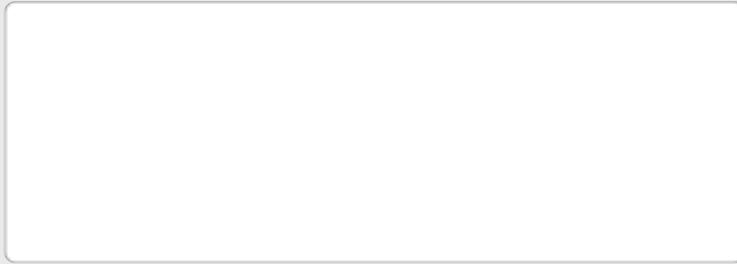
H) The project's facilities utilize space and materials to promote healthy parent-child engagement.



If you have documentation demonstrating implementation of the methods you described for supporting families, such as a policy or procedure manual, referral templates, pamphlets, or brochures, please upload the file(s) here. Other documentation may be acceptable.

Browse...

If it is difficult to upload evidence/documentation of the family supports provided, or if you were unaware that you should have a policy or procedure, please indicate that here. Indicate if there is something that can be shown to monitor during an on-site visit.



Program Management Policies

11. The agency is able to provide a policy to support period of record retention. Records pertaining to the program participant's qualification for the CoC Program are being retained for a minimum of 5 years after the expenditure of all funds from the grant under which the program participant was served. (24 CFR 578.103(c)(1))

Upload the policy or procedure for record retention here.

Browse...

12. Please select what evidence will be submitted for your Housing First Implementation evaluation for all of your CoC-funded projects. Select ALL that Apply. Note: The CoC is required to assess Housing First Implementation of all CoC-funded projects. *

- ☐ Programs/Agencies Housing First Policies and Procedures
- ☐ Program Intake Form/s
- ☐ Notices to clients (Participant Handbook, Program Rules and Expectations Agreement, etc)
- ☐ Program Termination Policies
- ☐ Template of lease/ occupancy agreements used (TH and PSH programs only)
- ☐ Other - Write In (Required)

13. Please attach all Housing First evidence to be assessed here. *

Browse...

Additional Comments

12. Please provide any comments or questions.

COVER PAGE

1E- 2 Local Competition Scoring Tool

Contents

1. 2024 Master Scoring Tool All Project Types - An Excel file including spreadsheets for

- a. Rating Ranking and Reallocation Protocols
- b. Renewal Project Threshold Review
- c. PSH Renewal Project
- d. RRH Renewal Project
- e. RRH- DV Renewal Project
- f. Joint Renewal Project
- g. Joint Project – DV Renewal
- h. Transitional Housing Renewal Project
- i. Safe Haven Renewal Project
- j. New Project Threshold
- k. New Project Scoring
- l. SSO Renewal
- m. CES Review
- n. HMIS Review
- o. Planning Grant Review

The data used in the renewal tools comes from APR and HMIS/DV Database reports, audits and monitoring Reports, ELOCCS and match documentation, cost effectiveness evaluation, standardized reviews for Housing First Assessments, Furthering Equity Assessment, and Performance Improvement Plan reviews. Forms and guidance for the local standardized review tools are attached. All project types use a 120 point maximum. All points derive from objective data or standardized forms.

120 Points for Renewals include: Grid included on each renewal tool.

Project - 45 points (37.5%) – rows 22-26; 31-33; 35-36

System Performance - 55 points (45.8%) – rows 16-21; 27

Barriers – 20 points (16.7%) – rows 28-30,34

The data in the new project tools come from Project Applications, fiscal reports, Housing First and Equity commitments, agency audits and monitoring reports, match documentation, Furthering Equity commitment and descriptions, cost effectiveness calculation.

2. Standardized Review Forms

- a. Housing First Assessments – HUD Tool and Local Review Standards
- b. Local CoC Monitoring Report
- c. Furthering Equity Review

RATING AND RANKING GENERAL DESCRIPTION

<i>Item</i>	<i>Documentation</i>
The U.S. Department of Housing and Urban Development (HUD) requires local Continuum of Care (CoC) areas to review and rank-order applications to be submitted to HUD under the annual CoC Competitive Notice of Funding Opportunity (NOFO).	NOFO
1. The first step in the Rating and Ranking Process, is to confirm that the Applicant organization and the Proposed Project meet the threshold requirements set by HUD and the local CoC.	Threshold Review - see source documents in Tracking List
2. The project ranking order is developed from a variety of factors such as the project raw score from the application scorecard (generated by HMIS and R&R), HUD and local priorities, and compliance with local and HUD quality project review guidelines. The process relies heavily on objective data, demonstrated capacity, measured performance, and alignment with local priorities . Data from HMIS and the Comparable DV Data base are used in the process.	Rating sheets; APR Housing First Review sheet; Audit, etc
3. Basic strategies and protocols for rank-ordering projects within the two tiers required by HUD are summarized in a separate notice Ranking Strategies and Protocols that supplements this document and is posted on the RTFHSD.org website.	Ranking Strategies Protocols
4. Maximizing Use of Funds: After initial scoring of projects; the CoC Rating and Ranking Committee review the rank order to ensure that protocols are followed: resolving ties; ensuring maximum use of funds; strategic consideration of the use of Tiering and any project straddling the two tiers, addressing system needs and benefit to the CoC . For example: ties are resolved by benefit to CoC using project type; number of units offered; length of project in CoC system, geographic location, and Board priorities. The Rating and Ranking process establishes the rank order of the projects in the priority listing.	Rating and Ranking protocols; Board action; Strategic Plan
5. The CoC Reallocation Protocols are found in a separate document that outlines the content, steps, and criteria for Reallocation of part or all of the funds for an eligible renewal project. To ensure maximum use of funds, the history of expenditures and level of unspent funds are components of the Reallocation Protocols that helps to establish the level of funding allocated to the Project. Also see Performance Improvement and Chronic Underspending Reallocation Policy.	Reallocation Protocols, Including general process, Performance Improvement, and Chronic Underspending Reallocation
6. Required System Projects (HMIS, CES) are placed in Tier 1 by Board directive.	Board Directive
7. In FY 24 There is an additional section of questions for applicants requesting DV Bonus funds. The projects are scored on the base points, then the DV bonus order is adjusted by the points in the special question section.	DV Question Response
8. In FY 24 The unranked CoC Planning Grant and YHDP Grants are listed below Tier 2.	HUD Directive
9. Per HUD Guidance, in FY 24 YHDP Renewal Projects and Replacement Projects are reviewed but not ranked. These are listed as unranked.	HUD Directive
10. HUD regulations in 24 CFR part 578.7(a) 6 require the CoC to "take action against poor performers". To that end, the CoC Board authorized a Performance Improvement Plan (PIP) requirement that is incorporated into the Rating and Ranking process. If an Applicant fails to meet the PIP requirements for any project, the project is subject to reallocation.	PIP Listed on Scoring, R&R Review of PIP Performance Evidence
11. Although not required by HUD, local process includes opportunity for Appeal. Please refer to the Notice of Appeal posted on the RFTHSD.org website	Appeal Notice and Decision

RENEWAL THRESHOLD REQUIREMENTS

Project Name: _____

Projects *must* meet these criteria which are separate from the numeric scoring.

Organization Name: _____

Project Type: _____

Project Identifier: _____

REVIEW TEAM NUMBER only
ID:

TA

Renewal Projects
Threshold Review
Complete

0%

THRESHOLD REQUIREMENTS	YES/NO
------------------------	--------

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFA criteria each year.

Y

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration that is valid until January 2025 (submitted evidence)	
2. Applicant has Valid Entity Unique Identifier (UEI) number in application. (Submitted Evidence)	
3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless they have a repayment schedule and they are not delinquent, or otherwise have evienc of approval by HUD.	
4. Applicant has no Debarments and/or Suspensions - No award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government.	
5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings. (Submitted Audit. Provide Local review description)	
6. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.	
7. Demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are,under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.	
8. Submitted the required certifications as specified in the NOFO and Local INTENT to SUBMIT.	
9. Demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.	
10. Demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards, if deemed necessary to protect attorney client privilege.	

11. Demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review each the NOFO and the local Threshold Handout and the Documents Needed List to account for additional standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:

- (a) Project applicants and potential subrecipients must have **satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded** under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, **regular drawdowns, and timely resolution of any monitoring findings**;
- (b) **For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources; and,**
- (c) Project applicants must demonstrate they will be able to meet all timeliness standards. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring findings related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant. *(Note: Project contracts must be signed on or before December 31 of the renewal operating year.)*

12. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). *(Note: These certificates are gathered by RTFH Technical Assistance prior to submittal of the application.) Applicants identify relevant page(s) in ConPlan.*
13. Meets HUD thresholds in the CoC NOFO: History of inadequate financial practices; indications of mismanagement; drastic reduction in population served; made project changes without HUD prior approval; or lost a project site.

CoC THRESHOLD REQUIREMENTS

For each requirement, select “Yes” if the project has provided reasonable assurances that the project will meet the requirement, or has been given an exception by the CoC or has requested a Waiver from HUD. Otherwise select “No”.

Coordinated Entry Participation	
Housing First and/or Low Barrier Implementation	
Documented, secured minimum match	
Project is financially feasible	
Applicant commits to CoC participation.	
Application is complete and data are consistent	
Acceptable organizational audit/financial review	
Documented organizational financial stability	
Demonstrated Site Control is strongly advised.	
New Projects Submit General Certification	

PSH RENEWAL RATING TOOL 2024

Agency

Project

Project Type

Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (less than 50%)	Data Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3	Notes
HUD CoC Thresholds	Acceptable organization general review (CoC)	PSH	0		Yes			CoC Monitoring - Documentation, etc.	0	0	0	
HUD CoC Thresholds	Application is complete and has required attachments	PSH	0		Yes			Review Checklist	0	0	0	
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	PSH	0		Yes			Signed Commitment Form on Intent	0	0	0	
HUD CoC Thresholds	Documented, secured minimum match	PSH	0		Yes			Application - Signed agreements	0	0	0	
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	PSH	0		Yes			Commitment Signed	0	0	0	
HUD CoC Thresholds	Project Participation in HMIS	PSH	0		Yes			Commitment or active project in HMIS/DV	0	0	0	
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	PSH	0		Yes			Threshold Review Page & Sources	0	0	0	
Exits to Permanent Housing	Minimum percent remain in or move to permanent housing	PSH	25		>= 91%	45.5% - 90%	< 45.5%	APR (calculation)	25	12.5	0	
Length of Stay	On average, participant who left stayed in project ## days	PSH	5		>= 1090 days	545 -1089 days	< 545 days	APR Q	5	2.5	0	
New or Increased Earned Income	Minimum new or increased earned income for project leavers	PSH	2		>=8%	4-7.9%	< 4%	APR Q	2	1	0	
New or Increased Earned Income	Minimum new or increased earned income for project stayers	PSH	2		>=11%	5.5% - 10.9%	< 5.5%	APR Q	2	1	0	
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	PSH	3		>=41%	20.5% - 40.9%	<20.5	APR Q	3	1.5	0	
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	PSH	3		>=55%	27.5% - 54.5%	< 27.5%	APR Q	3	1.5	0	
Project Effectiveness	Housing First and/or Low Barrier Implementation	PSH	5		>=90%	80-89%	<80%	Housing First Scoring Tool completed & % of total p	5	3	0	
Project Effectiveness	Audit Monitoring: Documented organization financial stability	PSH	5		0 Issues	2 issues / corrected	substantial deficiency risk	Audit/ Monitoring Review Form	5	3	0	
Project Effectiveness	CoC Review - management; documentation	PSH	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0	
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending, includes recapture \$	PSH	6		>= 95%	>=90-94%	< 90%	E-LOCES report; use of funds; grant closeout reports	6	3	0	
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	PSH	12		<= 5 % (no more than 5% above benchmark)	<=7% No more than 7% above benchmark)	>7. % or more above benchmark	Full points= Not more than 5% above average cost per successful exit (Project Budget; APR ; and Cost Chart)	12	6	0	2024 Benchmark PSH Base: Fam = 6437; IND = 11694; Mixed = 13,194
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ Exit	PSH	15		<=7%	>7.0%-10.5	> 10.5%	HMIS Report	15	7.5	0	
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	PSH	5		>=39%	19% - 38%	< 19%	APR calculation	5	2.5	0	
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	PSH	5		>=55%	27.5% - 54.0%	< 27.5%	APR calculation	5	2.5	0	
Serves High Need Populations	Minimum percent of participants with zero income at entry	PSH	5		>=36%	18% - 35.9%	< 18%	APR calculation	5	2.5	0	
Priority Vulnerable Population - DV	Project dedicated to DV	PSH	1		100%	NA	NA	Intent form, HIC designation	1	0	0	
Priority Project - Chronic	Project % serve CH	PSH	1		= 100%	>=50%	< 50%	APR Q served	1	0.5	0	
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/youth	PSH	1		>50%	50%	<50%	Application & APR served	1	0.5	0	
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	PSH	5		= 5	Up to 1 point per item - scoring review	< 1	Furthering Equity Report Review form up to 1 point per action item met.	5	per scoring review	0	
System Priority- Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	PSH	5		Yes >= 25% Leverage	Yes < 25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0	
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence).	PSH	5		27% and Above	25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0	
PIP PLAN BENCHMARK Points			Possible Points	120								
				66								

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP
If the Project was under PIP in both 2022 and 2023, review for Reallocation

Section added for Application review			
App 1E -2B data classification Added for Application Review	Points Available		
Threshold			
Threshold			
Threshold			
Threshold			
Threshold			
Threshold			
System Performance	25		
System Performance	5		
System Performance	2		
System Performance	2		
System Performance	3		
System Performance	3		
Objective data - Project	5		
Objective data - Project	5		
Objective data - Project	4		
Objective data - Project	6		
Objective data - Project	12		
System Performance	15		
Barriers	5		
Barriers	5		
Barriers	5		
Objective data - Project	1		
Objective data - Project	1		
Objective data - Project	1		
Barriers	5		
Objective data - Project	5		
Objective data - Project	5		
TOTAL	Objective data - Project	45	37.50%
TOTAL	System Performanc	55	45.83%
TOTAL	Barriers	20	16.67%

RRH RENEWAL RATING TOOL 2024

Notes

Agency		Team Reviewer
Project		
Project Type		
Project Identifier		

												Section added for Application			
Category	Criteria	Project T	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99% benchmark)	Partial Benchmark 3 (less than 50% benchmark)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3_4	classification Added for Application Review	Points Available		
HUD CoC Thresholds	Acceptable organization general review (CoC)	RRH	0		Yes			CoC Monitoring - Documentation.etc	0	0	0	Threshold			
HUD CoC Thresholds	Application is complete and has required attachments	RRH	0		Yes			Review Checklist	0	0	0	Threshold			
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	RRH	0		Yes			Signed Commitment Form on Intent	0	0	0	Threshold			
HUD CoC Thresholds	Documented, secured minimum match	RRH	0		Yes			Application - Signed agreements	0	0	0	Threshold			
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	RRH	0		Yes			Commitment Signed	0	0	0	Threshold			
HUD CoC Thresholds	Project Participation in HMIS	RRH	0		Yes			Commitment or active project in HMIS/DV	0	0	0	Threshold			
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	RRH	0		Yes			Threshold Review Page & Sources	0	0	0	Threshold			
Exits to Permanent Housing	Minimum percent move to permanent housing	RRH	25		> =57%	28.5% - 56%	< 28.5%	APR calculation	25	12.5	0	Performance	25		
Length of Stay (RRH should move quickly)	On average, participant who left stayed in project XX days	RRH	5		< 362 days	363 - 541 days	> =541	APR Q	5	2.5	0	System Performance	5		
New or Increased Income and Earned Income	Minimum new or increased earned income for project leavers	RRH	2		> =21%	10.5% - 20%	< 10.5%	APR Q	2	1	0	System Performance	2		
New or Increased Income and Earned Income	Minimum new or increased earned income for project stayers	RRH	2		> =30%	15% - 29%	< 15%	APR Q	2	1	0	System Performance	2		
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	RRH	3		> =19%	9.5% -18%	< 9.5%	APR Q	3	1.5	0	System Performance	3		
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	RRH	3		> =31%	15.5% - 30%	< 15.5%	APR Q	3	1.5	0	System Performance	3		
Project Effectiveness	Housing First and/or Low Barrier Implementation	RRH	5		>=90%	80%-89%	<80%	Self Assessment Tool	5	3	0	Objective data - Project	5		
Project Effectiveness	Audit Monitoring: Documented organization financial stability	RRH	5		0 Issues	2 issues / corrected	more than 2 or substantial deficiency - risk	Audit/ Monitoring Review Form	5	2	0	Objective data - Project	5		
Project Effectiveness	CoC Review - management; documentation	RRH	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0	Objective data - Project	4		
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	RRH	6		>= 95%	>=90%- 94%	< 90%	E-LOCCS report; use of funds grant closeout reports	6	3	0	Objective data - Project	6		
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	RRH	12		<= 5 % above	<=7% above	More than 7% above	Not more than 5% above average cost per successful exit	12	6	0	2023 BASE: FAM=16937, IND=22721, Mixed = 12218	Objective data - Project	12	
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	RRH	15		<=15%	>15%- 22%	> 22%	APR Calculation	15	7.5	0	System Performance	15		
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	RRH	5		> =58%	29% - 57%	< 29%	APR calculation	5	2.5	0	Barriers	5		
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	RRH	5		> =25%	12.5% - 24%	< 12.5%	APR calculation	5	2.5	0	Barriers	5		
Serves High Need Populations	Minimum percent of participants with zero income at entry	RRH	5		> =34%	17% - 33%	< 17%	APR calculation	5	2.5	0	Barriers	5		
Priority Vulnerable Population - DV	Project dedicated to DV	RRH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0	Objective data - Project	1		
Priority Project - Chronic	Project % serve CH	RRH	1		100%	50% +	<50%	APR Q - served	1	0.5	0	Objective data - Project	1		
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	RRH	1		>50%	50%	<50%	Application & APR served	1	0.5	0	Objective data - Project	1		
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	RRH	5		5	Up to 1 point per item, per review	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	per review form	0	Barriers	5		
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	RRH	5		Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0	Objective data - Project	5		
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence)	RRH	5		Yes >= 25%	25%	NA	Application/ MOU, Leverage letter, contract for non CoC/ESG Housing	5	3	0	Objective data - Project	5		
PIP Benchmark Points		Possible - 120		66								TOTAL	Objective data - Project	45	37.50%
												TOTAL	System Performance	55	45.83%
												TOTAL	Barriers	20	16.67%

RRH FOR DV RENEWAL TOOL 2024

Agency

Project

Project Type

Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	RRH - DV	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	RRH - DV	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	RRH - DV	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	RRH - DV	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	RRH - DV	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	RRH - DV	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	RRH-DV	0		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	RRH - DV	25		> =91%	45% -90%	< 45%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days	RRH - DV	5		<= 364 days	364-546 days	>=546 days	APR Q	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	RRH - DV	2		> =23.5%	11.5% - 23%	< 11.5%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	RRH - DV	2		0	N/A	N/A	APR Q	2	0	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	RRH - DV	3		> =12%	6% - 11%	< 6%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	RRH - DV	3		0	NA	NA	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	RRH - DV	5		>=90%	80%-89%	<80%	Self Assessment Tool	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	RRH - DV	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	RRH - DV	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	RRH - DV	6		>= 95%	>=90%- 94%	< 90%	E-LOCCS report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	RRH - DV	12		<= 5 % above	<<7% above	More than 7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness- Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	RRH - DV	15		<=1%	> 1.0%-1.5%	>1.5%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	RRH - DV	5		> =20.5%	10%-20%	< 10%	APR calculation	5	2.5	0
Serves High Need Populations (Severe Service needs)	Minimum percent of participants with 2 or more disabilities	RRH - DV	5		> =10%	5% - 9%	< 5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	RRH - DV	5		> =12%	6% - 11%	< 6%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	PSH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	RRH - DV	1		100%	50% -99%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	RRH - DV	1		>50%	50%	<50%	Application & APR; served	1	0.5	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	RRH - DV	5		5	up to 1 point per action	< 1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	RRH - DV	5		Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence)	RRH - DV	5		Yes >=25%	Yes < 25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
PIP Benchmark Points			Possible 120	66							

Section added for Application review

28 data classification Added

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JOINT RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	Joint	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	Joint	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	Joint	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	Joint	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	Joint	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	Joint	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	Joint	0		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	Joint	25		> =68%	34% - 67%	< 34%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days (quick movement)	Joint	5		< =334 days	335-500 days	> 500 days	APR calculation	5	2.5	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project leavers	Joint	2		> =22%	11% - 21%	< 11%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project stayers	Joint	2		> =35%	17.5% - 34%	< 17%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	Joint	3		> =8%	4% -8%	< 4%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	Joint	3		> =3%	1.5-<3%	< 1.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	Joint	5		>=90%	80%-89%	<80%	Self Assessment Tool Score	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	Joint	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	Joint	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	Joint	6		>= 95%	>=90%-94%	< 90%	E-LOCCS report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	Joint	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	Joint	15		< =2%	>2%- 3%	>3%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	Joint	5		> =40.5%	20%-40%	< 20%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities	Joint	5		> =25%	12.5% - 24%	< 12.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	Joint	5		> =42%	21% - 41%	< 21%	APR calculation	5	2.5	0
Priority Vulnerable Population -DV	Project dedicated to DV	Joint	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	Joint	1		100%	50%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population -Seniors	% Service to Seniors/Youth	Joint	1		>50%	50%	<50%	Application & APR dedicated	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	Joint	5		5	up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	Joint	5		Yes>=25%	Yes<25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -CoC or ESG source (with evidence)	Joint	5		Yes >=25%	Yes <25%	N/A	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0
PIP Benchmark points			Possible points	120	66						

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

If Yes, PIP required before submittal to HUD

Was Project under PIP in 2023?

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

Section added for Application review	
2B data classification	Points Available
Threshold	
Threshold	
Threshold	
Threshold	
Threshold	
Threshold	
Threshold	
System Performance	25
System Performance	5
System Performance	2
System Performance	2
System Performance	3
System Performance	3
Objective data - Project	5
Objective data - Project	5
Objective data - Project	4
Objective data - Project	6
Objective data - Project	12
System Performance	15
Barriers	5
Barriers	5
Barriers	5
data - Project	1
Objective data - Project	1
Objective data - Project	1
Barriers	5
data - Project	5
Objective data -	5
TOTAL	Objective data - Project
TOTAL	System Performance
TOTAL	Barriers

JOINT - DV RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	Joint - DV	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	Joint - DV	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	Joint - DV	Yes		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	Joint - DV	Yes		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	Joint - DV	Yes		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	Joint - DV	yes - DV base		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	Joint - DV	Yes		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	Joint - DV	25		90%	45%-89%	<45%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days (Quickly Move)	Joint - DV	5		< =308 days	309-463 days	> 463 days	APR calculation	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	Joint - DV	2		> =48%	24% -47%	< 24%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	Joint - DV	2		> =44%	22% -43%	< 22%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	Joint - DV	3		> =25%	12.5% - 24%	< 12.5%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	Joint - DV	3		> =11%	5.5% - 10%	< 5.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	Joint - DV	5		>=90%	80%-89%	<80%	Self Assessment Tool Score	5	2.5	0
Project Effectiveness	Audit Monitoring: Documented organization financial stability	Joint - DV	5		0 Issues	2 Issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	Joint - DV	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds- spending rates; unspent funds, slow spending; includes recapture \$	Joint - DV	6		>= 95%	>=90%-94%	< 90%	E-LOCES report/use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	Joint - DV	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	Joint - DV	15		0%	0 - 1%	>1%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	Joint - DV	5		1%	0.50%	< .5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service needs)	Joint - DV	5		> =5%	2.5- 5%	< 2.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	Joint - DV	5		> = 21%	10.5% - 20%	< 10.5%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	Joint - DV	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	Joint - DV	1		100%	50%	<50%	APR Q- served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	Joint - DV	1		>50%	50%	<50%	Application & APR served	1	0.5	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	Joint - DV	5		5	Up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	Joint - DV	5		Yes > =25%	Yes<25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -CoC or ESG source (with evidence)	Joint - DV	5		Yes >=25%	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
Possible			120								
PIP Benchmark points			66								

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

Section added for			
data classification	Added for Application	Points Available	
Threshold			
Threshold			
Threshold			
Threshold			
System Performance		25	
System Performance		5	
System Performance		2	
System Performance		2	
System Performance		3	
System Performance		3	
Objective data - Project		5	
Objective data - Project		5	
data - Project		4	
Objective data - Project		6	
Objective data - Project		12	
System Performance		15	
Barriers		5	
Barriers		5	
Barriers		5	
data - Project		1	
Objective data - Project		1	
Objective data - Project		1	
Barriers		5	
Objective data - Project		5	
Objective data - Project		5	
TOTAL	Objective data - Project		
TOTAL	System Performance	45	37.50%
TOTAL	Barriers	55	45.83%
		20	16.67%

TH (DV) RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for Full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	TH	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments.	TH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	TH	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	TH	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	TH	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	TH	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	TH	Yes		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	TH	25		> =75%	37%- 74%	< 37%	APR calculation	25	12.5	0
Length of Stay (Quickly Move)	On average, participants stay in project XX days (Max 2 y	TH	5		< 274 days	<=274-547days	>547	APR calculation	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	TH	2		> =33%	16.5% - 32%	< 16.5 %	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	TH	2		> =0%	NA	NA	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	TH	3		> =18.5%	9.% - 18%	< 9%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	TH	3		0%	N/A	N/A	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	TH	5		>=90%	>=80% - 89%	<80%	Housing First Self Assessment score and points	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	TH	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit / Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	TH	4		0 Issues	1-2 Issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	TH	6		>= 95%	>=90%-94%	< 90%	E-LOCES report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	TH	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	TH	15		<=2%	>2-3.5%	>3.5%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	TH	5		> =20%	10%- 19%	< 10%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service Needs)	TH	5		> =6%	3% - 5%	< 3%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	TH	5		> =34%	17% - 33%	< 17%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	TH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	TH	1		100%	50%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/Youth	TH	1		>50%	50%	<50%	Application & APR Served	1	0.5	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	TH	5		5	up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	TH	5		Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -COC or ESG source (with evidence)	TH	5		Yes >=25% and Above	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0
Total Possible Points			120								

PIP Benchmark 66

Note: TH has 2 DV projects and 1 Safe Haven

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

Section added for Application review	
App 1E -28 data classification Added for Application Review	Points Available
Threshold	
Threshold	
Threshold	
Threshold	
Threshold	
Threshold	
Threshold	
System Performance	25
System Performance	5
System Performance	2
System Performance	2
System Performance	3
System Performance	3
Objective data - Project	5
Objective data - Project	5
Objective data - Project	4
Objective data - Project	6
Objective data - Project	12
System Performance	15
Barriers	5
Barriers	5
Barriers	5
Objective data - Project	1
Objective data - Project	1
Objective data - Project	1
Barriers	5
Objective data - Project	5
Objective data - Project	5
TOTAL	45 37.50%
TOTAL	55 45.83%
TOTAL	20 16.67%

SAFE HAVEN RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	SH	0		Yes			CoC Monitoring - Docu	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	SH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	SH	0		Yes			Signed Commitment For	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	SH	0		Yes			Application - Signed agr	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	SH	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	SH	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	SH	Yes		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing (HUD)	Minimum percent move to permanent housing	SH	25		>= 75%	37.5% - 74%	<37.5%	APR calculation	25	12.5	0
Length of Stay	On average, participants stay in project XX days	SH	5		>=412 days	206-411 days	< 206 days	APR calculation	5	2.5	0
New or Increased Income and Employment	Minimum new or increased earned income for project leavers	SH	2		0	N/A	N/A	APR Q	2	1	0
New or Increased Income and Employment	Minimum new or increased earned income for project stayers	SH	2		0	N/A	N/A	APR Q	2	1	0
New or Increased Income and Employment	Minimum new or increased non-employment income for project leavers	SH	3		>=12.5%	6.25% - 12%	< 6.25%	APR Q	3	1.5	0
New or Increased Income and Employment	Minimum new or increased non-employment income for project stayers	SH	3		>=0%	NA	NA	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	SH	5		>=90%	80% - 90%	<80%	Housing First Assessment Score % points	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	SH	5		0 Issues	2 issues / corrected	substantial deficiency - risk	it / Monitoring Review F	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	SH	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funde	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	SH	6		>= 95%	>=90 - 94%	<90%	E-LOCES report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	SH	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	SH	15		<=25%	25% - 30%	>30%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	SH	5		>= 47%	23.5% - 46%	< 23.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service Needs)	SH	5		>=80%	40% - 79%	< 40%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	SH	5		>=27%	13.5% - 26%	< 13.5%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	SH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	SH	1		100%	50%	< 50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	SH	1		>50%	50%	< 50%	Application & APR Serve	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	SH	5		5	up to 1 point per action	< 1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	SH	5		Yes =>25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -CoC or ESG source (with evidence)	SH	5		Yes >=25%	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
Total Possible Points			120								
PIP Benchmark Points			66								

Performance Improvement Evaluation
Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

Section added for Application review			
App 1E - 2B data classification	Added for Application Review	Points Available	
Threshold			
Threshold			
Threshold			
Threshold			
Threshold			
Threshold			
Threshold			
Threshold			
System Performance		25	
System Performance		5	
System Performance		2	
System Performance		2	
System Performance		3	
System Performance		3	
Objective data - Project		5	
Objective data - Project		5	
Objective data - Project		4	
2024 Base = NA for families; 5% = 11,239 IND; 7%=11453 IND	Objective data - Project	6	
Objective data - Project		12	
System Performance		15	
Barriers		5	
Barriers		5	
Barriers		5	
Objective data - Project		1	
Objective data - Project		1	
Objective data - Project		1	
Barriers		5	
Objective data - Project		5	
Objective data - Project		5	
Objective data - Project		45	37.50%
TOTAL	System Pe	55	45.83%
TOTAL	Barriers	20	16.67%

NEW PROJECT THRESHOLD REQUIREMENTS

Project Name: _____

Projects *must* meet these criteria which are separate from the numeric scoring.

Organization Name: _____

Project Type: _____

Project Identifier: _____

REVIEW TEAM NUMBER ONLY

New Projects
Threshold Review
Complete

0%

THRESHOLD REQUIREMENTS	YES/NO
------------------------	--------

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFOs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFO criteria each year.

Y

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration and submitted evidence. (Registration will need to be valid through January 2025 or renewed prior to then.)	<div></div>
2. Applicant has Valid Entity Unique Identifier (UEI) number in application. (Submitted Evidence)	<div></div>
3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless they have a repayment schedule and they are not delinquent, or otherwise have evidence of approval by HUD.	<div></div>
4. Applicant has no Debarments and/or Suspensions - No award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government, any department.	<div></div>
5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings. (Submitted Audit. Provide Local review description)	<div></div>
6. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.	<div></div>
7. Demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are,under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.	<div></div>
8. Submitted the required certifications as specified in the NOFO and Local INTENT to SUBMIT.	<div></div>
9. Demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.	<div></div>
10. Demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards, if deemed necessary to protect attorney client privilege.	<div></div>

11. Demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review each the NOFO and the local Threshold Handout and the Documents Needed List to account for additional standards. To be considered as meeting project quality threshold, all projects must meet all of the following criteria:

(a) Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings, if there are no existing grants, evidence from similar funding source;

(b) Project applicants must clearly demonstrate that they are not replacing other funding sources; and,

(c) Project applicants must demonstrate they will be able to meet all timeliness standards. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring finding related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on a prior grant. *(Note: Project contracts must be signed on or before December 31, of the award year.*

12. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). Applicants identify the page references in relevant Plan(s). *(Note: The signed certificates are gathered by RTFH Technical Staff prior to submittal of the application.)*

13. Meets HUD thresholds and project criteria for CoC NOFO: History of inadequate financial practices; indications of mismanagement; drastic reduction in population served; or lost a project site. See New Agency Threshold Checklist if this is the first time the first time the agency is applying for CoC funding.

CoC THRESHOLD REQUIREMENTS

For each requirement, select “Yes” if the project has provided reasonable assurances that the project will meet the requirement, or has been given an exception by the CoC or has requested a Waiver from HUD. Otherwise select “No”.

Coordinated Entry Participation	
Housing First and/or Low Barrier Implementation	
Documented, secured minimum match	
Project is financially feasible	
Applicant commits to CoC participation.	
Application is complete and data are consistent	
Acceptable organizational audit/financial review	
Documented organizational financial stability	
Demonstrated Site Control is strongly advised.	
New Projects Submit General Certification	

NEW PROJECT RATING TOOL 2024

Agency
Project
Project Type
Project Identifier

TEAM #

Review complete

THRESHOLD PAGE IS COMPLETED FIRST
Meet Threshold = Yes, No, Correction Needed

WHERE TO FIND INFORMATION
Application Screen 1B
DETAILED INSTRUCTIONS GUIDE lists questions and expected responses.

RATING FACTOR	Point Awarded	Max Points Awarded	SCORING GUIDE	WHERE TO FIND INFORMATION	CONSIDERATIONS/ NOTES
1. EXPERIENCE 25 points possible				DATA SOURCE	Reviewer Notes
2.B. Describe your organization's and subrecipients experience in effectively utilizing federal or other public funds, AND			Points Guide	PSH	
1. a)Working with and addressing the target population(s) housing and service needs; b) developing and implementing program systems, services, and property; c) securing match funds. Hint: Be specific, include numbers.	0	7	clear description that includes the target population + > 5 years = 7; 3-5 years = 3; less than 3 =1 If # years not given, does the description inclde \$1 Million or more in past awards.	Application Sections 2B + 3B1	
2. Describe your organization's experience with leveraging public and private resources. What level of resouces were managed?	0	3	Measurable = 1; Public resources = 1; Private resources 1; Add all= 3 What is the lvl of funds managed previously? If \$1+ million in public funds, award 3 points	Section 2B	
3 Describe your organization's financial management structure.	0	2	Notes: include fund accounting or cost accounting; clear description. Award 1 point for clear description, 2 points if includes reference to fund -based, or funding source based, or CFr part 200.	Section 2B Q 2+3	
4. Describe any findings from monitoring reports and financial audit. (Monitoring letter attached, or statement of no monitorings in past 2 years.)	0	5	Monitoring no findings = 5; 2 deficiencies = 2; deficiencies noted as corrected =1; major finding =0 Audit review is in Financial section B.	ATTCHMENTS Two Steps: 1) Check Monitoring Reports for Findings and See questions in Financial Section Item B #1,and2; See Audit Review in Financial section using Audit review Guide	
5. Commitment and Implementation of Housing First approach. See Application Questions: Low Barrier and rapid move to Housing. See Housing First Checksheet	0	5	Application section 2B 5d. says "YES" And Housing First Tool.	Two Steps: Check Application Q. 2B5 . 1)If agency has RENEWAL projects as well, Look at Housing First Self Assessment score at the endof he Tool alter points if needed to reflect HF tool SCORE.]	
6. Benefit to CoC, fits priorities, geographic needs, helps fulfill policies or plan.	0	3	Clearly Fits priorities =2	Two Sections on Tool: NOFO Priorities; Project Effectiveness	
Experience subtotal	0	25			
2. DESIGN OF HOUSING & SERVICES 25 point possible				3A Project Detail & Description	3C Expansion Information
	Awarded	Maximum	Guide	PSH	
A. Extent to which the applicant:					
1. Demonstrate understanding of the needs of the clients to be served.	0	3	References needs , Characteristic of clients, or best practices.	SECTION 3B1	JOINT project EXPANSION, pgs.67-69
2. Demonstrate type, scale, and location of the housing fit the needs of the clients to be served	0	3	Clear description + references to best practices =3; Clear but has more than 16 chronic persons in a single site = 1	SECTION 3B5	
3. Demonstrate type and scale of the all supportive services, regardless of funding source, meet the needs of the clients to be served.	0	3	Ties need to characteristic of clients = 3 ; describes services but not tied to client need =2; lists services only= 1; does not address services, type and scale of services = 0	Section 4A	
4. Demonstrate how clients will be assisted in obtaining and coordinating the provision of mainstream benefits	0	3	Clear actions and supports + SOAR or SSI training = 3; has 2 of the 3 actions listed = 2; only lists mainstream services = 1	Part 4 A 2	
5. Establish performance measures for housing and income that are objective, measurable, trackable, and meet or exceed any established HUD, HEARTH or CoC benchmarks	0	3	Includes percentages or numbers = move to housing exceeds 85%; income supports job/income results at 25% or more; includes measuarbel goals at less than these thresholds = 1; does not give measurable goals=0	Application section 3B+ &4	
B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs. (Review for Best Practicess for Population)	0	5	Includes how to secure housing (master lease, landlord recruitment; housing inspections, uses established lists; low barriers entry)= 3 of 5 points; and how to retain (post placement supports, intervention, casemanagement, followup communication, etc) = 2 of 5 points	Application sections 3 &4	
C. Serves most vulnerable (chronic, severe service needs, disabilities, etc)	0	3	Target group = chronic, seniors, persons with multiple disabilities, DV= 1 point; Over-represented/Underserved groups - racial diversity, gender- non-conforming 2 points, disabilities)	Application section 3B and chart, section 5B	
D. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.	0	2	Specific actions and measures = 2; description with out specific measures = 1	Application Sections 5A and 5B plus description in 3B	
Design of housing and services subtotal	0	25			
3. TIMELINESS 8 points possible			Awarded Maximum		Reviewer Notes
A. Describe plan for rapid implementation of the program documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award. Plans for Data entry and draw down meet local standards	0	2	3B 2 chart - all factors less than 365 days. Should NOT incude acquisition, rehab, or new construction.	3B 2 chart	
B. Timeliness of drawdowns, reporting, HMIS or other data entry	0	6	Evidence of on-time spending: monitoring, audit review,or e-LOCCS for current COC provider	Financial documents - Audit, ELOCCS for other project in same agency	
Timeliness Subtotal	0	8			
4. FINANCIAL 20 points possible			Awarded Maximum	See Audit Guide PPT	Reviewer Notes
A. Project is cost-effective - comparing projected cost per person served to CoC average within project type	0	12	Calculate cost below. Compare with cost for renewals in same group (chart). Average costs and Points Chart	Use the cost effectiveness benchmark chart for project type (psh,rrh, joint PLUS HH type Family, Individuals, Mixed.	
B. Audit Review			Most recent AUDIT must be provided		
1. Most recent audit found no exceptions to standard practices	0	3	See Audit Guide		
2. Most recent audit identified agency as 'low risk'	0	3	See Audit Guide		
C. Project Budget costs are reasonable, allocable, and allowable	0	1	Is the level of service and costs reasonable? Could the housing and services be delivered on the budget presented?	Use the cost effectiveness benchmark chart for project type (psh,rrh, joint PLUS HH type Family, Individuals, Mixed.	
D. Provides evidence of 25% match for all costs except leasing.	0	1	Section 6I and Letter Attached show 25% of costs execept for leasing. Check Summary Bude	Section 6-I; 6.J and Letter in attachments	
Financial Subtotal	0	20			
5. PROJECT EFFECTIVENESS (planned) 15 points possible			Awarded Maximum		Reviewer Notes
A. Addresses high need/vulnerable populations:	0	5	Seniors, Chronic, DV, Justice-Involved, persons with disabilities or severe service needs, youth, 3 or more = 5 points; 2= 2points; 1 = 1 point	Project Description 3B and Household charts 5B	
B. Geneneral Evaluation of application - consistency, value to CoC - geographic need, creates housing, etc. - reader discretion	0	4	Application complete, cohesive, serves CoC Need, general impression of application taken as a whole	Reader observation, all req. application doc.	
C. Project effectiveness: sets reasonable and measurable goal; provided evidence for outcomes from a similar project COC or Non-CoC funding.	0	3	Is the project feasible given the budget and number of persons to be served? Is staffing level sufficient for number of clients and housing type? Reader discretion up to 1 point per each of these questions.	Project budget sect 6 & staffing (support services budget) vs # beds /Clients on HH and Participant charts) sect.5	
D. Involvement of Persons with Lived Experience	0	3	Includes PLE in decision-making role; hires PLE; gathers feedback from clients	See Furthering Equity Commitment Form and instructions	
Project Effectiveness Subtotal	0	15			
6. COC BENEFIT AND NOFO PRIORITIES 27 points possible					Reviewer Notes
A. Health and Housing Project	0	5	Has 25% commitment for health care outside CoC/ESG with Letter/ contract to prove = 5; has commitment but no letter = 3; describes in house services = 2; minimal contribution = 1	MOU attachments, healthcare commitment	
B. Has 25% or more units without CoC housing assistance	0	5	Has 25% commitment for housing units outside CoC/ESG funds with Letter/ contract to prove = 5; has commitment but no letter = 3; describes how it will acquire leverage = 2; minimal contribution = 1	Housing attachments; housing budget + units committed	
C. 100% DV Project or Expansion for 100% DV	0	3	Must be 100% if DV Bonus Project	100% DV HH	
E. LGBTQ+ focus	0	2	Describes commitment to LGBTQIA persons as core group = 2; includes LGBTQIA but not primary group = 1	Project description/ checklist	
D. Furthering Equity	0	5	1 point per action committed to on Equity Form	Number of items checked on commitment form	
E. System Need: (Board priority;Self-reallocation, fits Plan; area of geographic need, fills system gap)	0	5	Priorities include: PSH, Serving persons with severe service needs, seniors		
F. Provides Con Plan evidence	0	2	Consistent with area Consolidated Plan Pages.Lists Con Plan pages on Intent form.	See provider document of Con Plan Pages showing consistency	

CoC Benefit and NOFO Priorities Sub Total		0	27		
TOTAL Points		0	120		
CoC funding requested: Cost Effectiveness CALCULATION		Amount			
Amount of other public funding (federal, state, county, city)				Consider what the project is bringing in from other public and private resources. This can be used to adjust ranking, or as a tie breaker.	
Amount of private funding (non-governmental).					
TOTAL MATCH					
COST EFFECTIVENESS CALCULATION					
		Totals			
Number of Units Proposed (section 4B- 2.2a) of application)				Calculate Cost Effectiveness by taking the total Budget requested from CoC Funds and divide by Number of beds (below).Use bed numbers from section 4B in the application compared with Total HUD request amount from Summary Budget Section 6J. ROW 11. The HUD request does not include the match amount.	
Number of Beds/ Clients Proposed (Section 4B. 2.2b) of application)					
Total HUD Funds Requested (does not include match)				Summary budget - HUD request row.	
COST EFFECTIVENESS CALCULATION RESULTS				Enter the result of calculation: divide HUD request H75 by Total Beds H74.	
B1. Answers to Agency Capacity Questions for DV BONUS PROJECTS					
SPECIAL SECTION FOR DV BONUS FUNDS APPLICANTS		Points Awarded	Possible Points		
THESE ARE SUPPLEMENTAL QUESTIONS					
4A3-3f	Experience in providing DV housing and services - regardless of funding source		2	Number of years is 5 years or more award 2 points, if 2-5 years award 1 point. Less than 2 years = "0"	
Q4A -4	Ensuring DV Survivor Safety: interior lighting; exterior safety & security; private interview space,etc		1	Includes references to sfety features in the physical space. Award 1 point. If no references tophysical features, "0"	
Q 4A-4	Evaluating Ability to Ensure DV Client Safety: Described process for evlauating satey (lethality assessment? Staff training?		1	Describe safety screening process and staff training or qualifications Award 1 point. If notes only one of these, award one/half point.	
Q4A 3&4	Trauma Informed Care approaches and actions		2	Includes trauma informed care and client-centered or empowerment Award 2 points. If notesonly one of these, award 1 point.	
Q4A 3&4	Meets special services needs of DV - includes services like childcare; legal services; education; resolve bad credit/finances; housing search support.		1	Includes 2 or more special services, Award 1 Point,	
Q4A 3 g-h	Implementation Plan for new project (not current program)		1	Includes clear steps for implementation	
Q 4	RATE OF SUCCESS in housing placement Expanded question 1- Number proposed to attain permanent housing divided by total number to be served		1	Award 1 point if exceeds 75%	
Q 4	Expanded question 2 - Emergency Transfer		1	Discusses emergency transfer or linkages with emergency services and other shelter and services for DV.	
SPECIAL DV Section Total		0	10		
NOTE: THE SPECIAL SECTION FOR DV IS USED AFTER THE INITIAL SCORING IS COMPLETE. THIS SECTION HELPS US RANK ORDER THE NEW DV BONUS PROJECTS.					

NOTE: The proposed **Project Operating Dates for ALL projects** (Section 1D.SF 424) Question #17 should **start in 2025 and end in 2026.**

SSO RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_T	Max	Points	Benchmark for full	Partial	Partial Benchmark	Data_Source	Points Full	Points Benchmark	Points Benchmark	Points
			Points Possible			Benchmark 2						
HUD CoC Thresholds	Acceptable organization general review (CoC)	SSO	0		Yes			CoC Monitoring - Documentation.etc	0	0	0	
HUD CoC Thresholds	Application is complete and has required attachments	SSO	0		Yes				0	0	0	
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	SSO	0		Yes			Signed Commitment Form on Intent	0	0	0	
HUD CoC Thresholds	Documented, secured minimum match	SSO	0		Yes			Application - Signed agreements	0	0	0	
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	SSO	0		Yes			Commitment Signed	0	0	0	
HUD CoC Thresholds	Project Participation in HMIS	SSO	0		Yes			Commitment or active project in HMIS/DV	0	0	0	
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	SSO	Yes		Yes			Threshold Review Page & Sources	0	0	0	
Exits to Permanent Housing	Minimum percent move to permanent housing	SSO	25		> =36%	18%- 35%	< 18%	APR calculation	25	12.5	0	
Length of Stay	On average, participants stay in project XX days	SSO	5		> =186 days	93- 185 days	< 93 days	APR calculation	5	2.5	0	
New or Increased Earned Income	Minimum new or increased earned income for project leavers	SSO	2		> =4%	2- 3%	< 2%	APR Q	2	1	0	
New or Increased Earned Income	Minimum new or increased earned income for project stayers	SSO	2		> =28%	14% - 27%	< 14%	APR Q	2	1	0	
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	SSO	3		0	N/A	N/A	APR Q	3	1.5	0	
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	SSO	3		> =4%	2 - 3%	<2%	APR Q	3	0.15	0	
Project Effectiveness	Tied to Housing Project(s) Housing First and/or Low Barrier Implementation	SSO	5		>=90%	>=80%	<80%	Housing First Assessment Tool Points	5	2.5	0	
Project Effectiveness	Audit Monitoring- Documented organization financial stability	SSO	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit / Monitoring Review Form	5	2.5	0	
Project Effectiveness	CoC Review - management; documentation	SSO	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0	
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	SSO	6		>= 95%	>=90%-94%	<90%	E-LOCCS report;use of funds grant closeout reports	2	1	0	
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	SSO	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0	12,880 = 5%
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	SSO	15		<=23%	<= 24-35%	>35%	APR Calculation	15	7.5	0	13,127 = 7%
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	SSO	5		> =49%	24.5%- 48%	< 24.5%	APR calculation	5	2.5	0	
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service Needs)	SSO	5		>= 18%	>9%-17%	<9%	APR calculation	5	2.5	0	
Serves High Need Populations	Minimum percent of participants with zero income at entry	SSO	5		> = 52%	26% - 51%	< 26%	APR calculation	5	2.5	0	
Priority Vulnerable Population -DV	Project dedicated to DV	SSO	1		100%	NA	NA	Intent Form, HIC designation	1	0	0	
Priority Project - Chronic	Project % serve CH	SSO	1		100%	50%	<50%	APR Q - served	1	0.5	0	
Priority Vulnerable Population -Seniors	% Service to YOUTH	SSO	1		>50%	50%	<50%	Application & APR Served	1	0.5	0	
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	SSO	5		5	1 point per action	<1	Furthering Equity Report Review Form, up to 1 point per action item met.	5	4	0	
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	SSO	5		Yes =>25%	Yes <25%	No	Has written Healthcare MOU , non CoC or ESG	5	2	0	
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -COC or ESG source (with evidence)	SSO	5		Yes >=25% and Above	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0	
Total Possible Points			120									
PIP Benchmark Points			66									

Note: SSO Service projects =
SSO CE Projects =

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

FY2024 NOFO Renewal Review - Infrastructure Project - CES

CoC Threshold Requirements	Maximum Points	Points Awarded	(Data Source)
SAMs Registration	2		Intent/App
UEI Number Provided	2		Intent/App
Eligible Organization	2		Intent/App
Meets Federal Thresholds (debar, indebtedness, criminal acts, etc)	5		Intent/App
Operates on Housing First Principles	2		Intent/App
Application is complete and data is consistent	2		App Drop Box
CoC Requirement Total Points	15	0	
Applicant Experience and Proven Performance			
Applicant has direct experience in providing and operating similar project services	10		
Evidence supports applicant's compliance with operating standards	10		
Applicant timeliness in reporting	5		
Applicant Experience and Proven Performance	25	0	
Financial Management and Capacity			
Applicant financial structure capable of fund-based tracking	5		
Review of Independent Audit	5		
Project is financially feasible	5		
Documented minimum 25% Match	5		
Financial Management and Capacity	20	0	
Infrastructure Systems Support Program -Coordinated Entry System (CES)			
CES covers full CoC geography	5		
CES covers all applicable CoC project types	5		
CES utilizes standard screening tool(s) that can identify and reach priority populations	5		
CES includes outreach, prevention/diversion, assessment, housing opportunity, client choice, and placement to ensure participants are directed to appropriate housing and services that fit their needs.	5		
A guide or operations manual is available to participants	5		
Complies with DV regulations	5		
CES includes an anti-discrimination policy	5		
Infrastructure Systems Support Program -Coordinated Entry System (CES)	35	0	
Project Effectiveness			
Costs are within local average costs	10		
Project benefits the CoC as whole	10		
Project aligns with CoC established funding principles and Priorities	2		
Project goals and actions are clear	3		
Project Effectiveness	25	0	
Performance Measures Total Points			
Total Application Points	120	0	

FY 2024 NOFO INFRASTRUCTURE - HMIS RENEWAL			
CoC Threshold Requirements	Maximum Points	Points Awarded	(Data Source)
SAMs Registration	2		Intent/App
UEI Number Provided	2		Intent/App
Eligible Organization Type	2		Intent/App
Meets Federal Thresholds (debar, indebtedness, criminal acts, etc)	5		Intent/App
CoC HMIS implementation is regionwide	2		Intent/App
Application is complete and data is consistent	2		App Drop Box
CoC Requirement Total Points	15	0	
Applicant Experience and Proven Performance			
Applicant has direct experience in providing and operating similar project services	10		
Evidence supports applicant's compliance with operating standards	10		
Applicant timeliness in reporting: APR, PITC, CAPER/ESG required Data	5		
Applicant Experience and Proven Performance	25	0	
Infrastructure Systems Support Program -HMIS			
HMIS collects all Universal Data Elements as required	5		
HMIS capable of collecting data from all project types	5		
HMIS can de-duplicate client records	5		
HMIS can produce all required HUD reports	5		
A guide or operations manual is available to participants	5		
Complies with DV regulations	5		
HMIS includes privacy standards meeting HUD standards	5		
Infrastructure Systems Support Program -HMIS	35	0	
Financial Management and Capacity			
Applicant financial structure capable of fund-based tracking	5		App
Review of Independent Audit	5		Audit review guide
Project is financially feasible	5		Cost within fund range
Documented minimum 25% Match	5		Budget/App
Financial Management and Capacity	20	0	
Project / Cost Effectiveness			
Costs are within local average costs	10		
Project benefits the CoC as whole. Commits to gathering data to Further Equity (Race, Ethnicity, gender, vulnerable groups: LGBTQ, Senior, DV, Severe Service Needs)	10		
Project aligns with CoC established funding principles and Priorities	2		
Project goals and actions are clear	3		
Project Effectiveness	25	0	
Total Application Points	120	0	

FY2024 NOFO Renewal Review - Infrastructure Projects - Planning					
CoC Threshold Requirements	Maximum Points	Points Awarded	(Data Source)		
SAMs Registration	2		Intent/App		
UEI Number Provided	2		Intent/App		
Meets Federal Thresholds (debar, indebtedness, criminal acts, etc)	5		Intent/App		
Eligible Organization Type	2		Intent/App		
Coordinated Entry System (CES) participation, if applicable	2		Intent/App		
Application is complete and data is consistent	2		App Drop Box		
CoC Requirement Total Points	15	0			
Applicant Experience and Proven Performance					
Applicant has direct experience in providing and operating similar project services	10		Application	10+; 5+, <3	
Evidence supports applicant's compliance with operating standards	10		Monitoring	Monitoring file	
Applicant timeliness in reporting	5		HUD Rept dates	HDX,HIC,LSA	
Applicant Experience and Proven Performance	25	0			
Financial Management and Capacity					
Applicant financial structure capable of fund-based tracking	5		App		
Review of Independent Audit	5		Audit review guide	0 issues=5; 2 =3; >3=0	
Project is financially feasible	5		Cost within fund range		Chart
Documented minimum 25% Match	5		Budget/App	Letter	
Financial Management and Capacity	20	0			
Service to Vulnerable Populations					
Applicant promotes racial equity and commits to Furthering Equity Policy and Training	5		Form	1 each action	
Applicant addresses the needs and provides services unsheltered, vulnerable individuals and families	2		Application	% to vulnerable; Needs accurately described	
Aligned with policy priorities, populations and actions	2		Call for App	Per Call NOTICE	
Supports planning/ for one or more special needs populations: LGBTQ, Seniors, Severe Service Needs, DV, Over represented (BIPOC)	3		Application	2 or more; at least 1; 0	
	12	0			
Infrastructure System Support - CoC Planning Project					
Governance - Conducts meetings of CoC that are inclusive	5		agendas		
Has Written Governance Charter updated annually	5		charter with update insert		
Has CoC-wide committees and ad hoc groups to address the special needs of homeless persons	5		Committee list	special pops;	
Planning activities are compliant with 24CFR6578.7	3		See 24 CFR		
Activities work to plan, improve, and evaluate outcomes and service	5		Clear measures		
Infrastructure System Support - CoC Planning Project	23	0			
Project / Cost Effectiveness					
Costs are within local average costs	10		Compare with SC		
Project benefits the CoC as whole	10				
Project aligns with CoC established funding principles and priorities	2		see plan and Intent Call	reference priority; Level service	
Project goals and actions are clear	3				
Project Effectiveness	25	0			
Total Application Points	120	0			

RATING AND RANKING GENERAL DESCRIPTION

<i>Item</i>	<i>Documentation</i>
The U.S. Department of Housing and Urban Development (HUD) requires local Continuum of Care (CoC) areas to review and rank-order applications to be submitted to HUD under the annual CoC Competitive Notice of Funding Opportunity (NOFO).	NOFO
1. The first step in the Rating and Ranking Process, is to confirm that the Applicant organization and the Proposed Project meet the threshold requirements set by HUD and the local CoC.	Threshold Review - see source documents in Tracking List
2. The project ranking order is developed from a variety of factors such as the project raw score from the application scorecard (generated by HMIS and R&R), HUD and local priorities, and compliance with local and HUD quality project review guidelines. The process relies heavily on objective data, demonstrated capacity, measured performance, and alignment with local priorities . Data from HMIS and the Comparable DV Data base are used in the process.	Rating sheets; APR Housing First Review sheet; Audit, etc
3. Basic strategies and protocols for rank-ordering projects within the two tiers required by HUD are summarized in a separate notice Ranking Strategies and Protocols that supplements this document and is posted on the RTFHSD.org website.	Ranking Strategies Protocols
4. Maximizing Use of Funds: After initial scoring of projects; the CoC Rating and Ranking Committee review the rank order to ensure that protocols are followed: resolving ties; ensuring maximum use of funds; strategic consideration of the use of Tiering and any project straddling the two tiers, addressing system needs and benefit to the CoC . For example: ties are resolved by benefit to CoC using project type; number of units offered; length of project in CoC system, geographic location, and Board priorities. The Rating and Ranking process establishes the rank order of the projects in the priority listing.	Rating and Ranking protocols; Board action; Strategic Plan
5. The CoC Reallocation Protocols are found in a separate document that outlines the content, steps, and criteria for Reallocation of part or all of the funds for an eligible renewal project. To ensure maximum use of funds, the history of expenditures and level of unspent funds are components of the Reallocation Protocols that helps to establish the level of funding allocated to the Project. Also see Performance Improvement and Chronic Underspending Reallocation Policy.	Reallocation Protocols, Including general process, Performance Improvement, and Chronic Underspending Reallocation
6. Required System Projects (HMIS, CES) are placed in Tier 1 by Board directive.	Board Directive
7. In FY 24 There is an additional section of questions for applicants requesting DV Bonus funds. The projects are scored on the base points, then the DV bonus order is adjusted by the points in the special question section.	DV Question Response
8. In FY 24 The unranked CoC Planning Grant and YHDP Grants are listed below Tier 2.	HUD Directive
9. Per HUD Guidance, in FY 24 YHDP Renewal Projects and Replacement Projects are reviewed but not ranked. These are listed immediately above the unranked CoC Planning Grant	HUD Directive
10. HUD regulations in 24 CFR part 578.7(a) 6 require the CoC to "take action against poor performers". To that end, the CoC Board authorized a Performance Improvement Plan (PIP) requirement that is incorporated into the Rating and Ranking process. If an Applicant fails to meet the PIP requirements for any project, the project is subject to reallocation.	PIP Listed on Scoring, R&R Review of PIP Performance Evidence
11. Although not required by HUD, local process includes opportunity for Appeal. Please refer to the Notice of Appeal posted on the RFTHSD.org website	Appeal Notice and Decision

RENEWAL THRESHOLD REQUIREMENTS

Project Name: Projects must meet these criteria which are separate from the numeric scoring.

Organization Name:

Project Type:

Project Identifier:

REVIEW TEAM NUMBER only ID:

TA

Renewal Projects Threshold Review Complete

0%

THRESHOLD REQUIREMENTS	YES/NO
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Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFA criteria each year.

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HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration that is valid until January 2025 (submitted evidence)	
2. Applicant has Valid Entity Unique Identifier (UEI) number in application. (Submitted Evidence)	
3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless they have a repayment schedule and they are not delinquent, or otherwise have evienc of approval by HUD.	
4. Applicant has no Debarments and/or Suspensions - No award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government.	
5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings. (Submitted Audit. Provide Local review description)	
6. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.	
7. Demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are,under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.	
8. Submitted the required certifications as specified in the NOFO and Local INTENT to SUBMIT.	
9. Demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.	
10. Demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards, if deemed necessary to protect attorney client privilege.	

11. Demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review each the NOFO and the local Threshold Handout and the Documents Needed List to account for additional standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:

- (a) Project applicants and potential subrecipients must have **satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded** under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, **regular drawdowns, and timely resolution of any monitoring findings**;
- (b) **For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources; and,**
- (c) Project applicants must demonstrate they will be able to meet all timeliness standards. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring findings related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant. *(Note: Project contracts must be signed on or before December 31 of the renewal operating year.)*

12. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). *(Note: These certificates are gathered by RTFH Technical Assistance prior to submittal of the application.) Applicants identify relevant page(s) in ConPlan.*
13. Meets HUD thresholds in the CoC NOFO: History of inadequate financial practices; indications of mismanagement; drastic reduction in population served; made project changes without HUD prior approval; or lost a project site.

CoC THRESHOLD REQUIREMENTS

For each requirement, select “Yes” if the project has provided reasonable assurances that the project will meet the requirement, or has been given an exception by the CoC or has requested a Waiver from HUD. Otherwise select “No”.

Coordinated Entry Participation	
Housing First and/or Low Barrier Implementation	
Documented, secured minimum match	
Project is financially feasible	
Applicant commits to CoC participation.	
Application is complete and data are consistent	
Acceptable organizational audit/financial review	
Documented organizational financial stability	
Demonstrated Site Control is strongly advised.	
New Projects Submit General Certification	

PSH RENEWAL RATING TOOL 2024

Agency

Project

Project Type

Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (less than 50%)	Data Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	PSH	0		Yes			CoC Monitoring - Documentation, etc.	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	PSH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	PSH	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	PSH	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	PSH	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	PSH	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	PSH	0		Yes			Threshold Review Page & Sources	0	0	0
Exit to Permanent Housing	Minimum percent remain in or move to permanent housing	PSH	25		>= 91%	45.5% - 90%	< 45.5%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project ## days	PSH	5		>= 1090 days	545-1089 days	< 545 days	APR Q	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	PSH	2		>=8%	4-7.99%	< 4%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	PSH	2		>=11%	5.5% - 10.9%	< 5.5%	APR Q	2	1	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	PSH	3		>=41%	20.5% - 40.9%	<20.5	APR Q	3	1.5	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	PSH	3		>=55%	27.5% - 54.5%	< 27.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	PSH	5		>=90%	80-89%	<80%	Housing First Scoring Tool completed & % of total p	5	3	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	PSH	5		0 Issues	2 issues / corrected	substantial deficiency risk	Audit/ Monitoring Review Form	5	3	0
Project Effectiveness	CoC Review - management; documentation	PSH	4		0 Issues	1-2 Issues	more than 2 Issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	PSH	6		>= 95%	>=90-94%	< 90%	F-LOCES report; use of funds; grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	PSH	12		<= 5 % (no more than 5% above benchmark)	<=7% No more than 7% above benchmark)	>7.% or more above benchmark	Full points= Not more than 5% above average cost per successful exit (Project Budget; APR ; and Cost Chart)	12	6	0
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ Exit	PSH	15		<=7%	>7.0%-10.5	> 10.5%	HMIS Report	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	PSH	5		>=39%	19% - 38%	< 19%	APR calculation	5	2.5	0
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	PSH	5		>=55%	27.5% - 54.9%	< 27.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	PSH	5		>=36%	18% - 35.9%	< 18%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	PSH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	PSH	1		= 100%	>=50%	< 50%	APR Q served	1	0.5	0
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/youth	PSH	1		>50%	50%	<50%	Application & APR served	1	0.5	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender, disability)	PSH	5		= 5	Up to 1 point per item - scoring review	< 1	Furthering Equity Report Review form up to 1 point per action item met.	5	per scoring review	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	PSH	5		Yes >= 25% Leverage	Yes < 25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence).	PSH	5		27% and Above	25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0

PIP PLAN BENCHMARK Points

Possible Points	120
	66

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP
If the Project was under PIP in both 2022 and 2023, review for Reallocation

2024 Benchmark Base: Fam = 6437; IND = 11691; Mixed = 13,194

RRH RENEWAL RATING TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Max Points		Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99% benchmark)	Partial Benchmark 3 (less than 50% benchmark)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
		Project_T	Possible								
HUD CoC Thresholds	Acceptable organization general review (CoC)	RRH	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	RRH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	RRH	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	RRH	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	RRH	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	RRH	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	RRH	0		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	RRH	25		>=57%	28.5% - 56%	< 28.5%	APR calculation	25	12.5	0
Length of Stay (RRH should move quickly)	On average, participant who left stayed in project XX days	RRH	5		< 362 days	363 - 541 days	>=541	APR Q	5	2.5	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project leavers	RRH	2		>=21%	10.5% - 20%	< 10.5%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project stayers	RRH	2		>=30%	15% - 29%	< 15%	APR Q	2	1	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	RRH	3		>=19%	9.5% - 18%	< 9.5%	APR Q	3	1.5	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	RRH	3		>=31%	15.5% - 30%	< 15.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	RRH	5		>=90%	80%-89%	<80%	Self Assessment Tool	5	3	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	RRH	5		0 Issues	2 issues / corrected	more than 2 or substantial deficiency - risk	Audit/ Monitoring Review Form	5	2	0
Project Effectiveness	CoC Review - management; documentation	RRH	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	RRH	6		>= 95%	>=90%- 94%	< 90%	E-LOCES report; use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	RRH	12		<= 5 % above	<=7% above	More than 7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	RRH	15		<=15%	>15%- 22%	> 22%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	RRH	5		>=58%	29% - 57%	< 29%	APR calculation	5	2.5	0
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	RRH	5		>=25%	12.5% - 24%	< 12.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	RRH	5		>=34%	17% - 33%	< 17%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	RRH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	RRH	1		100%	50% +	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	RRH	1		>50%	50%	<50%	Application & APR served	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	RRH	5		5	Up to 1 point per item, per review	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	per review form	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	RRH	5		Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence)	RRH	5		Yes >= 25%	25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
PIP Benchmark Points		Possible 120		66							

(updated 8.15)

2023 BASE:
FAM=16937,
IND=22721, Mixed
= 12218

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

RRH FOR DV RENEWAL TOOL 2024

Agency

Project

Project Type

Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 <50%	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	RRH - DV	0		Yes			CoC Monitoring - Documentation etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	RRH - DV	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	RRH - DV	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	RRH - DV	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	RRH - DV	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	RRH - DV	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	RRH - DV	0		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	RRH - DV	25		> =91%	45% - 90%	< 45%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days	RRH - DV	5		< = 364 days	364-546 days	> =546 days	APR Q	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	RRH - DV	2		> =23.5%	11.5% - 23%	< 11.5%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	RRH - DV	2		0	N/A	N/A	APR Q	2	0	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	RRH - DV	3		> =12%	6% - 11%	< 6%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	RRH - DV	3		0	NA	NA	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	RRH - DV	5		>=90%	80%-89%	<80%	Self Assessment Tool	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	RRH - DV	5		0 Issues	2 Issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management, documentation	RRH - DV	4		0 Issues	1-2 Issues	more than 2 Issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds; slow spending; includes recapture \$	RRH - DV	6		>= 95%	>=90%- 94%	< 90%	E-LOCCS report/use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	RRH - DV	12		<= 5 % above	<=7% above	More than 7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	RRH - DV	15		<=1%	> 1.0% -1.5%	>1.5%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	RRH - DV	5		> =20.5%	10%-20%	< 10%	APR calculation	5	2.5	0
Serves High Need Populations (Severe Service needs)	Minimum percent of participants with 2 or more disabilities	RRH - DV	5		> =10%	5% - 9%	< 5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	RRH - DV	5		> =12%	6% - 11%	< 6%	APR calculation	5	2.5	0
Priority Vulnerable Population DV	Project dedicated to DV	PSH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	RRH - DV	1		100%	50%- 99%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population Seniors	% Service to Seniors/Youth	RRH - DV	1		>50%	50%	<50%	Application & APR; served	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	RRH - DV	5		5	up to 1 point per action	< 1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	RRH - DV	5		Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -CoC or ESG source (with evidence)	RRH - DV	5		Yes >=25%	Yes < 25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
PIP Benchmark Points			Possible	120							
				66							

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

If Yes, PIP required before submittal to HUD

Was Project under PIP in 2023?

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

Note: Future competitions will consider RRH general benchmarks.

Note: Future scoring will consider RRH general benchmark here.

2023 BASE:
FAAN=16937,
IND=22721, Mixed
= 12218
In this case, "0" is good.

JOINT RENEWAL TOOL 2024

Agency

Project

Project Type

Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	Joint	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	Joint	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	Joint	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	Joint	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	Joint	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	Joint	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	Joint	0		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	Joint	25		>=68%	34% - 67%	< 34%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days (quick movement)	Joint	5		< =334 days	335-500 days	> 500 days	APR calculation	5	2.5	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project leavers	Joint	2		> =22%	11% - 21%	< 11%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project stayers	Joint	2		> =35%	17.5% - 34%	< 17%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	Joint	3		> =8%	4% <-8%	< 4%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	Joint	3		> =3%	1.5<-3%	< 1.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	Joint	5		>=90%	80%-89%	<80%	Self Assessment Tool Score	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	Joint	5		0 Issues	2 Issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	Joint	4		0 Issues	1-2 Issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	Joint	6		>= 95%	>=90%-94%	< 90%	E-LOCES report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	Joint	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	Joint	15		< =2%	>2% -3%	>3%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	Joint	5		> =40.5%	20%-40%	< 20%	APR calculation	5	2.5	0
Serves High Need Populations (S	Minimum percent of participants with 2 or more disabilities	Joint	5		> =25%	12.5% - 24%	< 12.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	Joint	5		> =42%	21% - 41%	< 21%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	Joint	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	Joint	1		100%	50%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	Joint	1		>50%	50%	<50%	Application & APR dedicated	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	Joint	5		5	up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	Joint	5		Yes=>25%	Yes<25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence)	Joint	5		Yes >=25%	Yes <25%	N/A	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0
Possible points			120								
PIP Benchmark points			66								

2024 Base =Families
5%=8987 7%=9158; 5%
IND=6249 7%=6368;
Mixed 5%=10580
7%=10781

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

If Yes, PIP required before submittal to HUD

Was Project under PIP in 2023?

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

JOINT - DV RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	Joint - DV	0		Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	Joint - DV	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	Joint - DV	Yes		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	Joint - DV	Yes		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	Joint - DV	Yes		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	Joint - DV	yes - DV base		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	Joint - DV	Yes		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	Joint - DV	25		90%	45%-89%	<45%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days (Quickly Move)	Joint - DV	5		< =308 days	309-463 days	> 463 days	APR calculation	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	Joint - DV	2		> =48%	24% -47%	< 24%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	Joint - DV	2		> =44%	22% -43%	< 22%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	Joint - DV	3		> =25%	12.5% - 24%	< 12.5%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	Joint - DV	3		> =11%	5.5% - 10%	< 5.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	Joint - DV	5		>=90%	80%-89%	<80%	Self Assessment Tool Score	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	Joint - DV	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	Joint - DV	4		0 Issues	1-2 Issues	more than 2 Issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds; slow spending; includes recapture \$	Joint - DV	6		>= 95%	>=90%-94%	< 90%	E-LOCES report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	Joint - DV	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	Joint - DV	15		0%	0 - 1%	>1%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	Joint - DV	5		1%	0.50%	< .5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service needs)	Joint - DV	5		> =5%	0.50%	< .5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	Joint - DV	5		> = 21%	10.5% - 20%	< 10.5%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	Joint - DV	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	Joint - DV	1		100%	50%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	Joint - DV	1		>50%	50%	<50%	Application & APR served	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	Joint - DV	5		5	Up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	Joint - DV	5		Yes > =25%	Yes<25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -COC or ESG source (with evidence)	Joint - DV	5		Yes >=25%	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
PIP Benchmark points			Possible	120							
				66							

2024 Base
=Families
5%=8987
7%=9158:

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

TH (DV) RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	TH	0		Yes			CoC Monitoring - Documentation,etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments.	TH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	TH	0		Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	TH	0		Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	TH	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	TH	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	TH	Yes		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	TH	25		> =75%	37%- 74%	< 37%	APR calculation	25	12.5	0
Length of Stay (Quickly Move)	On average, participants stay in project XX days (Max 2 y	TH	5		< 274 days	<=274-547days	>547	APR calculation	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	TH	2		> =33%	16.5% - 32%	< 16.5 %	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	TH	2		> =0%	NA	NA	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	TH	3		> =18.5%	9.% - 18%	< 9%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	TH	3		0%	N/A	N/A	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	TH	5		>=90%	>=80% - 89%	<80%	Housing First Self Assessment score and points	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	TH	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit / Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	TH	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	TH	6		>= 95%	>=90%-94%	< 90%	E-LOCES report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	TH	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	TH	15		<=2%	>2-3.5%	>3.5%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	TH	5		> =20%	10%- 19%	< 10%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service Needs)	TH	5		> =6%	3% - 5%	< 3%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	TH	5		> =34%	17% - 33%	< 17%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	TH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	TH	1		100%	50%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/Youth	TH	1		>50%	50%	<50%	Application & APR Served	1	0.5	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	TH	5		5	up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	TH	5		Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -CoC or ESG source (with evidence)	TH	5		Yes >=25% and Above	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0
Total Possible Points			120								
PIP Benchmark			66								

Note: TH has 2 DV projects and 1 Safe Haven

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

Move through TH to PSH should be quick

Note: Future competitions will consider an overall benchmark.

= 12,881, 7% = 13,126
IND=5%=11,239; 75

;

SAFE HAVEN RENEWAL TOOL 2024

Agency

Project

Project Type

Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	SH	0		Yes			CoC Monitoring - Docum	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	SH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	SH	0		Yes			Signed Commitment For	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	SH	0		Yes			Application - Signed agre	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	SH	0		Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	SH	0		Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	SH	Yes		Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing (HUD)	Minimum percent move to permanent housing	SH	25		>= 75%	37.5% -74%	<37.5%	APR calculation	25	12.5	0
Length of Stay	On average, participants stay in project XX days	SH	5		>=412 days	206-411 days	< 206 days	APR calculation	5	2.5	0
New or Increased Income and Ea	Minimum new or increased earned income for project leavers	SH	2		0	N/A	N/A	APR Q	2	1	0
New or Increased Income and Ea	Minimum new or increased earned income for project stayers	SH	2		0	N/A	N/A	APR Q	2	1	0
New or Increased Income and Ea	Minimum new or increased non-employment income for project leavers	SH	3		>=12.5%	6.25% - 12%	< 6.25%	APR Q	3	1.5	0
New or Increased Income and Ea	Minimum new or increased non-employment income for project stayers	SH	3		>=0%	NA	NA	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	SH	5		>=90%	80% - 90%	<80%	Housing First Assessment Score % points	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	SH	5		0 Issues	2 issues / corrected	substantial deficiency - risk	it / Monitoring Review F	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	SH	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	SH	6		>= 95%	>=90 - 94%	<90%	E-LOCCS report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	SH	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	SH	15		<=25%	25% - 30%	>30%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	SH	5		>= 47%	23.5% - 46%	< 23.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service Needs)	SH	5		>=80%	40% - 79%	< 40%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	SH	5		>=27%	13.5% - 26%	< 13.5%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	SH	1		100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	SH	1		100%	50%	< 50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	SH	1		>50%	50%	< 50%	Application & APR Serve	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	SH	5		5	up to 1 point per action	< 1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	SH	5		Yes =>25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -COC or ESG source (with evidence)	SH	5		Yes >=25%	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0
Total Possible Points			120								
PIP Benchmark Points			66								

2024 Base = NA
for families; 5%
= 11,239 IND;
7%=11453 IND

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

If Yes, PIP required before submittal

Was Project under PIP in 2023?

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

NEW PROJECT THRESHOLD REQUIREMENTS

Project Name: _____

Projects *must* meet these criteria which are separate from the numeric scoring.

Organization Name: _____

Project Type: _____

Project Identifier: _____

REVIEW TEAM NUMBER ONLY

New Projects
Threshold Review
Complete

0%

THRESHOLD REQUIREMENTS	YES/NO
------------------------	--------

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFOs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFO criteria each year.

Y

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration and submitted evidence. (Registration will need to be valid through January 2025 or renewed prior to then.)	<div></div>
2. Applicant has Valid Entity Unique Identifier (UEI) number in application. (Submitted Evidence)	<div></div>
3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless they have a repayment schedule and they are not delinquent, or otherwise have evidence of approval by HUD.	<div></div>
4. Applicant has no Debarments and/or Suspensions - No award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government, any department.	<div></div>
5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings. (Submitted Audit. Provide Local review description)	<div></div>
6. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.	<div></div>
7. Demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are, under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.	<div></div>
8. Submitted the required certifications as specified in the NOFO and Local INTENT to SUBMIT.	<div></div>
9. Demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.	<div></div>
10. Demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards, if deemed necessary to protect attorney client privilege.	<div></div>

11. Demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review each the NOFO and the local Threshold Handout and the Documents Needed List to account for additional standards. To be considered as meeting project quality threshold, all projects must meet all of the following criteria:

(a) Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings, if there are no existing grants, evidence from similar funding source;

(b) Project applicants must clearly demonstrate that they are not replacing other funding sources; and,

(c) Project applicants must demonstrate they will be able to meet all timeliness standards. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring finding related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on a prior grant. *(Note: Project contracts must be signed on or before December 31, of the award year.*

12. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). Applicants identify the page references in relevant Plan(s). *(Note: The signed certificates are gathered by RTFH Technical Staff prior to submittal of the application.)*

13. Meets HUD thresholds and project criteria for CoC NOFO: History of inadequate financial practices; indications of mismanagement; drastic reduction in population served; or lost a project site. See New Agency Threshold Checklist if this is the first time the first time the agency is applying for CoC funding.
- CoC THRESHOLD REQUIREMENTS
- For each requirement, select “Yes” if the project has provided reasonable assurances that the project will meet the requirement, or has been given an exception by the CoC or has requested a Waiver from HUD. Otherwise select “No”.
- | | |
|--|--|
| Coordinated Entry Participation | |
| Housing First and/or Low Barrier Implementation | |
| Documented, secured minimum match | |
| Project is financially feasible | |
| Applicant commits to CoC participation. | |
| Application is complete and data are consistent | |
| Acceptable organizational audit/financial review | |
| Documented organizational financial stability | |
| Demonstrated Site Control is strongly advised. | |
| New Projects Submit General Certification | |

NEW PROJECT RATING TOOL 2024

Agency
Project
Project Type
Project Identifier

TEAM #

Review complete

THRESHOLD PAGE IS COMPLETED FIRST
Meet Threshold = Yes, No, Correction Needed

WHERE TO FIND INFORMATION
Application Screen 1B
DETAILED INSTRUCTIONS GUIDE lists questions and expected responses.

RATING FACTOR	Point Awarded	Max Points Awarded	SCORING GUIDE	WHERE TO FIND INFORMATION	CONSIDERATIONS/ NOTES
1. EXPERIENCE 25 points possible				DATA SOURCE	Reviewer Notes
2.B. Describe your organization's and subrecipients experience in effectively utilizing federal or other public funds, AND			Points Guide	PSH	
1. a)Working with and addressing the target population(s) housing and service needs; b) developing and implementing program systems, services, and property; c) securing match funds. Hint: Be specific, include numbers.	0	7	clear description that includes the target population + > 5 years = 7; 3-5 years = 3; less than 3 =1 If # years not given, does the description inclde \$1 Million or more in past awards.	Application Sections 2B + 3B1	
2. Describe your organization's experience with leveraging public and private resources. What level of resouces were managed?	0	3	Measurable = 1; Public resources = 1; Private resources 1; Add all= 3 What is the lvl of funds managed previously? If \$1+ million in public funds, award 3 points	Section 2B	
3 Describe your organization's financial management structure.	0	2	Notes: include fund accounting or cost accounting; clear description. Award 1 point for clear description, 2 points if includes reference to fund -based, or funding source based, or CFr part 200.	Section 2B Q 2+3	
4. Describe any findings from monitoring reports and financial audit. (Monitoring letter attached, or statement of no monitorings in past 2 years.)	0	5	Monitoring no findings = 5; 2 deficiencies = 2; deficiencies noted as corrected =1; major finding =0 Audit review is in Financial section B.	ATTCHMENTS Two Steps: 1) Check Monitoring Reports for Findings and See questions in Financial Section Item B #1,and2; See Audit Review in Financial section using Audit review Guide	
5. Commitment and Implementation of Housing First approach. See Application Questions: Low Barrier and rapid move to Housing. See Housing First Checksheet	0	5	Application section 2B 5d. says "YES" And Housing First Tool.	Two Steps: Check Application Q. 2B5 . 1)If agency has RENEWAL projects as well, Look at Housing First Self Assessment score at the endof he Tool alter points if needed to reflect HF tool SCORE.]	
6. Benefit to CoC, fits priorities, geographic needs, helps fulfill policies or plan.	0	3	Clearly Fits priorities =2	Two Sections on Tool: NOFO Priorities; Project Effectiveness	
Experience subtotal	0	25			
2. DESIGN OF HOUSING & SERVICES 25 point possible				3A Project Detail & Description	3C Expansion Information
	Awarded	Maximum	Guide	PSH	
A. Extent to which the applicant:					
1. Demonstrate understanding of the needs of the clients to be served.	0	3	References needs , Characteristic of clients, or best practices.	SECTION 3B1	JOINT project EXPANSION, pgs.67-69
2. Demonstrate type, scale, and location of the housing fit the needs of the clients to be served	0	3	Clear description + references to best practices =3; Clear but has more than 16 chronic persons in a single site = 1	SECTION 3B5	
3. Demonstrate type and scale of the all supportive services, regardless of funding source, meet the needs of the clients to be served.	0	3	Ties need to characteristic of clients = 3 ; describes services but not tied to client need =2; lists services only= 1; does not address services, type and scale of services = 0	Section 4A	
4. Demonstrate how clients will be assisted in obtaining and coordinating the provision of mainstream benefits	0	3	Clear actions and supports + SOAR or SSI training = 3; has 2 of the 3 actions listed = 2; only lists mainstream services = 1	Part 4 A 2	
5. Establish performance measures for housing and income that are objective, measurable, trackable, and meet or exceed any established HUD, HEARTH or CoC benchmarks	0	3	Includes percentages or numbers = move to housing exceeds 85%; income supports job/income results at 25% or more; includes measuarbel goals at less than these thresholds = 1; does not give measurable goals=0	Application section 3B+ &4	
B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs. (Review for Best Practicess for Population)	0	5	Includes how to secure housing (master lease, landlord recruitment; housing inspections, uses established lists; low barriers entry)= 3 of 5 points; and how to retain (post placement supports, intervention, casemanagement, followup communication, etc) = 2 of 5 points	Application sections 3 &4	
C. Serves most vulnerable (chronic, severe service needs, disabilities, etc)	0	3	Target group = chronic, seniors, persons with multiple disabilities, DV= 1 point; Over-represented/Underserved groups - racial diversity, gender- non-conforming 2 points, disabilities)	Application section 3B and chart, section 5B	
D. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.	0	2	Specific actions and measures = 2; description with out specific measures = 1	Application Sections 5A and 5B plus description in 3B	
Design of housing and services subtotal	0	25			
3. TIMELINESS 8 points possible			Awarded Maximum		Reviewer Notes
A. Describe plan for rapid implementation of the program documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award. Plans for Data entry and draw down meet local standards	0	2	3B 2 chart - all factors less than 365 days. Should NOT incude acquisition, rehab, or new construction.	3B 2 chart	
B. Timeliness of drawdowns, reporting, HMIS or other data entry	0	6	Evidence of on-time spending: monitoring, audit review,or e-LOCCS for current COC provider	Financial documents - Audit, ELOCCS for other project in same agency	
Timeliness Subtotal	0	8			
4. FINANCIAL 20 points possible			Awarded Maximum	See Audit Guide PPT	Reviewer Notes
A. Project is cost-effective - comparing projected cost per person served to CoC average within project type	0	12	Calculate cost below. Compare with cost for renewals in same group (chart). Average costs and Points Chart	Use the cost effectiveness benchmark chart for project type (psh,rrh, joint PLUS HH type Family, Individuals, Mixed.	
B. Audit Review			Most recent AUDIT must be provided		
1. Most recent audit found no exceptions to standard practices	0	3	See Audit Guide		
2. Most recent audit identified agency as 'low risk'	0	3	See Audit Guide		
C. Project Budget costs are reasonable, allocable, and allowable	0	1	Is the level of service and costs reasonable? Could the housing and services be delivered on the budget presented?	Use the cost effectiveness benchmark chart for project type (psh,rrh, joint PLUS HH type Family, Individuals, Mixed.	
D. Provides evidence of 25% match for all costs except leasing.	0	1	Section 6I and Letter Attached show 25% of costs execept for leasing. Check Summary Bude	Section 6-I; 6.J and Letter in attachments	
Financial Subtotal	0	20			
5. PROJECT EFFECTIVENESS (planned) 15 points possible			Awarded Maximum		Reviewer Notes
A. Addresses high need/vulnerable populations:	0	5	Seniors, Chronic, DV, Justice-Involved, persons with disabilities or severe service needs, youth. 3 or more = 5 points; 2= 2points; 1 = 1 point	Project Description 3B and Household charts 5B	
B. Geneneral Evaluation of application - consistency, value to CoC - geographic need, creates housing, etc. - reader discretion	0	4	Application complete, cohesive, serves CoC Need, general impression of application taken as a whole	Reader observation, all req. application doc.	
C. Project effectiveness: sets reasonable and measurable goal; provided evidence for outcomes from a similar project COC or Non-CoC funding.	0	3	Is the project feasible given the budget and number of persons to be served? Is staffing level sufficient for number of clients and housing type? Reader discretion up to 1 point per each of these questions.	Project budget sect 6 & staffing (support services budget) vs # beds /Clients on HH and Participant charts) sect.5	
D. Involvement of Persons with Lived Experience	0	3	Includes PLE in decision-making role; hires PLE; gathers feedback from clients	See Furthering Equity Commitment Form and instructions	
Project Effectiveness Subtotal	0	15			
6. COC BENEFIT AND NOFO PRIORITIES 27 points possible					Reviewer Notes
A. Health and Housing Project	0	5	Has 25% commitment for health care outside CoC/ESG with Letter/ contract to prove = 5; has commitment but no letter = 3; describes in house services = 2; minimal contribution = 1	MOU attachments, healthcare commitment	
B. Has 25% or more units without CoC housing assistance	0	5	Has 25% commitment for housing units outside CoC/ESG funds with Letter/ contract to prove = 5; has commitment but no letter = 3; describes how it will acquire leverage = 2; minimal contribution = 1	Housing attachments; housing budget + units committed	
C. 100% DV Project or Expansion for 100% DV	0	3	Must be 100% if DV Bonus Project	100% DV HH	
E. LGBTQ+ focus	0	2	Describes commitment to LGBTQIA persons as core group = 2; includes LGBTQIA but not primary group = 1	Project description/ checklist	
D. Furthering Equity	0	5	1 point per action committed to on Equity Form	Number of items checked on commitment form	
E. System Need: (Board priority;Self-reallocation, fits Plan; area of geographic need, fills system gap)	0	5	Priorities include: PSH, Serving persons with severe service needs, seniors		
F. Provides Con Plan evidence	0	2	Consistent with area Consolidated Plan Pages.Lists Con Plan pages on Intent form.	See provider document of Con Plan Pages showing consistency	

CoC Benefit and NOFO Priorities Sub Total		0	27		
TOTAL Points		0	120		
CoC funding requested: Cost Effectiveness CALCULATION		Amount			
Amount of other public funding (federal, state, county, city)				Consider what the project is bringing in from other public and private resources. This can be used to adjust ranking, or as a tie breaker.	
Amount of private funding (non-governmental).					
TOTAL MATCH					
COST EFFECTIVENESS CALCULATION					
		Totals			
Number of Units Proposed (section 4B- 2.2a) of application)				Calculate Cost Effectiveness by taking the total Budget requested from CoC Funds and divide by Number of beds (below).Use bed numbers from section 4B in the application compared with Total HUD request amount from Summary Budget Section 6J. ROW 11. The HUD request does not include the match amount.	
Number of Beds/ Clients Proposed (Section 4B. 2.2b) of application)					
Total HUD Funds Requested (does not include match)				Summary budget - HUD request row.	
COST EFFECTIVENESS CALCULATION RESULTS				Enter the result of calculation: divide HUD request H75 by Total Beds H74.	
B1. Answers to Agency Capacity Questions for DV BONUS PROJECTS					
SPECIAL SECTION FOR DV BONUS FUNDS APPLICANTS		Points Awarded	Possible Points		
THESE ARE SUPPLEMENTAL QUESTIONS					
4A3-3f	Experience in providing DV housing and services - regardless of funding source		2	Number of years is 5 years or more award 2 points, if 2-5 years award 1 point. Less than 2 years = "0"	
Q4A -4	Ensuring DV Survivor Safety: interior lighting; exterior safety & security; private interview space,etc		1	Includes references to sfety features in the physical space. Award 1 point. If no references tophysical features, "0"	
Q 4A-4	Evaluating Ability to Ensure DV Client Safety: Described process for evlauating satey (lethality assessment? Staff training?		1	Describe safety screening process and staff training or qualifications Award 1 point. If notes only one of these, award one/half point.	
Q4A 3&4	Trauma Informed Care approaches and actions		2	Includes trauma informed care and client-centered or empowerment Award 2 points. If notesonly one of these, award 1 point.	
Q4A 3&4	Meets special services needs of DV - includes services like childcare; legal services; education; resolve bad credit/finances; housing search support.		1	Includes 2 or more special services, Award 1 Point,	
Q4A 3 g-h	Implementation Plan for new project (not current program)		1	Includes clear steps for implementation	
Q 4	RATE OF SUCCESS in housing placement Expanded question 1- Number proposed to attain permanent housing divided by total number to be served		1	Award 1 point if exceeds 75%	
Q 4	Expanded question 2 - Emergency Transfer		1	Discusses emergency transfer or linkages with emergency services and other shelter and services for DV.	
SPECIAL DV Section Total		0	10		
NOTE: THE SPECIAL SECTION FOR DV IS USED AFTER THE INITIAL SCORING IS COMPLETE. THIS SECTION HELPS US RANK ORDER THE NEW DV BONUS PROJECTS.					

NOTE: The proposed **Project Operating Dates for ALL projects** (Section 1D.SF 424) Question #17 should **start in 2025 and end in 2026.**

SSO RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Team Reviewer

Review complete

Category	Criteria	Project_T	Max	Points	Benchmark for full	Partial	Partial Benchmark	Data_Source	Points Full	Points Benchmark	Points Benchmark	Points
			Points Possible		Points (100%)	Benchmark 2 (50-99%)	3 (<50%)		Benchmark	2	3	Benchmark
HUD CoC Thresholds	Acceptable organization general review (CoC)	SSO	0		Yes			CoC Monitoring - Documentation,etc	0	0	0	
HUD CoC Thresholds	Application is complete and has required attachments	SSO	0		Yes				0	0	0	
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	SSO	0		Yes			Signed Commitment Form on Intent	0	0	0	
HUD CoC Thresholds	Documented, secured minimum match	SSO	0		Yes			Application - Signed agreements	0	0	0	
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	SSO	0		Yes			Commitment Signed	0	0	0	
HUD CoC Thresholds	Project Participation in HMIS	SSO	0		Yes			Commitment or active project in HMIS/DV	0	0	0	
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	SSO	Yes		Yes			Threshold Review Page & Sources	0	0	0	
Exits to Permanent Housing	Minimum percent move to permanent housing	SSO	25		> =36%	18%- 35%	< 18%	APR calculation	25	12.5	0	
Length of Stay	On average, participants stay in project XX days	SSO	5		> =186 days	93- 185 days	< 93 days	APR calculation	5	2.5	0	
New or Increased Earned Income	Minimum new or increased earned income for project leavers	SSO	2		> =4%	2-3%	< 2%	APR Q	2	1	0	
New or Increased Earned Income	Minimum new or increased earned income for project stayers	SSO	2		> =28%	14% - 27%	< 14%	APR Q	2	1	0	
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	SSO	3		0	N/A	N/A	APR Q	3	1.5	0	In future, this will require some alternare measure
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	SSO	3		>=4%	2 - 3%	<2%	APR Q	3	0.15	0	
Project Effectiveness	Tied to Housing Project(s) Housing First and/or Low Barrier Implementation	SSO	5		>=90%	>=80%	<80%	Housing First Assessment Tool Points	5	2.5	0	
Project Effectiveness	Audit Monitoring- Documented organization financial stability	SSO	5		0 Issues	2 issues / corrected	substantial deficiency - risk	Audit / Monitoring Review Form	5	2.5	0	
Project Effectiveness	CoC Review - management; documentation	SSO	4		0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0	
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	SSO	6		>= 95%	>=90%-94%	<90%	E-LOCCS report;use of funds grant closeout reports	2	1	0	
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	SSO	12		<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0	12,880 = 5%
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	SSO	15		<=23%	<= 24-35%	>35%	APR Calculation	15	7.5	0	13,127 = 7%
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	SSO	5		> =49%	24.5%- 48%	< 24.5%	APR calculation	5	2.5	0	
Serves High Need Populations	Minimum percent of participants with 2 or more disabilities (Severe Service Needs)	SSO	5		>= 18%	>9%-17%	<9%	APR calculation	5	2.5	0	
Serves High Need Populations	Minimum percent of participants with zero income at entry	SSO	5		> = 52%	26% - 51%	< 26%	APR calculation	5	2.5	0	
Priority Vulnerable Population DV	Project dedicated to DV	SSO	1		100%	NA	NA	Intent Form, HIC designation	1	0	0	
Priority Project - Chronic	Project % serve CH	SSO	1		100%	50%	<50%	APR Q - served	1	0.5	0	
Priority Vulnerable Population Seniors	% Service to YOUTH	SSO	1		>50%	50%	<50%	Application & APR Served	1	0.5	0	
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender,disability)	SSO	5		5	1 point per action	<1	Furthering Equity Report Review Form, up to 1 point per action item met.	5	4	0	
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	SSO	5		Yes =>25%	Yes <25%	No	Has written Healthcare MOU , non CoC or ESG	5	2	0	
System Priority - HOUSING Leverage	Provides 25% Housing assistance from non -COC or ESG source (with evidence)	SSO	5		Yes >=25% and Above	Yes <25%	NA	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0	
Total Possible Points			120									
PIP Benchmark Points			66									

Note: SSO Service projects =
SSO CE Projects =

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

If Yes, PIP required before submittal

Was Project under PIP in 2023?

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

FY2024 NOFO Renewal Review - Infrastructure Project - CES

CoC Threshold Requirements	Maximum Points	Points Awarded	(Data Source)
SAMs Registration	2		Intent/App
UEI Number Provided	2		Intent/App
Eligible Organization	2		Intent/App
Meets Federal Thresholds (debar, indebtedness, criminal acts, etc)	5		Intent/App
Operates on Housing First Principles	2		Intent/App
Application is complete and data is consistent	2		App Drop Box
CoC Requirement Total Points	15	0	
Applicant Experience and Proven Performance			
Applicant has direct experience in providing and operating similar project services	10		
Evidence supports applicant's compliance with operating standards	10		
Applicant timeliness in reporting	5		
Applicant Experience and Proven Performance	25	0	
Financial Management and Capacity			
Applicant financial structure capable of fund-based tracking	5		
Review of Independent Audit	5		
Project is financially feasible	5		
Documented minimum 25% Match	5		
Financial Management and Capacity	20	0	
Infrastructure Systems Support Program -Coordinated Entry System (CES)			
CES covers full CoC geography	5		
CES covers all applicable CoC project types	5		
CES utilizes standard screening tool(s) that can identify and reach priority populations	5		
CES includes outreach, prevention/diversion, assessment, housing opportunity, client choice, and placement to ensure participants are directed to appropriate housing and services that fit their needs.	5		
A guide or operations manual is available to participants	5		
Complies with DV regulations	5		
CES includes an anti-discrimination policy	5		
Infrastructure Systems Support Program -Coordinated Entry System (CES)	35	0	
Project Effectiveness			
Costs are within local average costs	10		
Project benefits the CoC as whole	10		
Project aligns with CoC established funding principles and Priorities	2		
Project goals and actions are clear	3		
Project Effectiveness	25	0	
Performance Measures Total Points			
Total Application Points	120	0	

FY 2024 NOFO INFRASTRUCTURE - HMIS RENEWAL

CoC Threshold Requirements	Maximum Points	Points Awarded	(Data Source)
SAMs Registration	2		Intent/App
UEI Number Provided	2		Intent/App
Eligible Organization Type	2		Intent/App
Meets Federal Thresholds (debar, indebtedness, criminal acts, etc)	5		Intent/App
CoC HMIS implementation is regionwide	2		Intent/App
Application is complete and data is consistent	2		App Drop Box
CoC Requirement Total Points	15	0	
Applicant Experience and Proven Performance			
Applicant has direct experience in providing and operating similar project services	10		
Evidence supports applicant's compliance with operating standards	10		
Applicant timeliness in reporting: APR, PITC, CAPER/ESG required Data	5		
Applicant Experience and Proven Performance	25	0	
Infrastructure Systems Support Program -HMIS			
HMIS collects all Universal Data Elements as required	5		
HMIS capable of collecting data from all project types	5		
HMIS can de-duplicate client records	5		
HMIS can produce all required HUD reports	5		
A guide or operations manual is available to participants	5		
Complies with DV regulations	5		
HMIS includes privacy standards meeting HUD standards	5		
Infrastructure Systems Support Program -HMIS	35	0	
Financial Management and Capacity			
Applicant financial structure capable of fund-based tracking	5		App
Review of Independent Audit	5		Audit review guide
Project is financially feasible	5		Cost within fund range
Documented minimum 25% Match	5		Budget/App
Financial Management and Capacity	20	0	
Project / Cost Effectiveness			
Costs are within local average costs	10		
Project benefits the CoC as whole. Commits to gathering data to Further Equity (Race, Ethnicity, gender, vulnerable groups: LGBTQ, Senior, DV, Severe Service Needs)	10		
Project aligns with CoC established funding principles and Priorities	2		
Project goals and actions are clear	3		
Project Effectiveness	25	0	
Total Application Points	120	0	

FY2024 NOFO Renewal Review - Infrastructure Projects - Planning					
CoC Threshold Requirements	Maximum Points	Points Awarded	(Data Source)		
SAMs Registration	2		Intent/App		
UEI Number Provided	2		Intent/App		
Meets Federal Thresholds (debar, indebtedness, criminal acts, etc)	5		Intent/App		
Eligible Organization Type	2		Intent/App		
Coordinated Entry System (CES) participation, if applicable	2		Intent/App		
Application is complete and data is consistent	2		App Drop Box		
CoC Requirement Total Points	15	0			
Applicant Experience and Proven Performance					
Applicant has direct experience in providing and operating similar project services	10		Application	10+; 5+, <3	
Evidence supports applicant's compliance with operating standards	10		Monitoring	Monitoring file	
Applicant timeliness in reporting	5		HUD Rept dates	HDX,HIC,LSA	
Applicant Experience and Proven Performance	25	0			
Financial Management and Capacity					
Applicant financial structure capable of fund-based tracking	5		App		
Review of Independent Audit	5		Audit review guide	0 issues=5; 2 =3; >3=0	
Project is financially feasible	5		Cost within fund range		Chart
Documented minimum 25% Match	5		Budget/App	Letter	
Financial Management and Capacity	20	0			
Service to Vulnerable Populations					
Applicant promotes racial equity and commits to Furthering Equity Policy and Training	5		Form	1 each action	
Applicant addresses the needs and provides services unsheltered, vulnerable individuals and families	2		Application	% to vulnerable; Needs accurately described	
Aligned with policy priorities, populations and actions	2		Call for App	Per Call NOTICE	
Supports planning/ for one or more special needs populations: LGBTQ, Seniors, Severe Service Needs, DV, Over represented (BIPOC)	3		Application	2 or more; at least 1; 0	
	12	0			
Infrastructure System Support - CoC Planning Project					
Governance - Conducts meetings of CoC that are inclusive	5		agendas		
Has Written Governance Charter updated annually	5		charter with update insert		
Has CoC-wide committees and ad hoc groups to address the special needs of homeless persons	5		Committee list	special pops;	
Planning activities are compliant with 24CFR6578.7	3		See 24 CFR		
Activities work to plan, improve, and evaluate outcomes and service	5		Clear measures		
Infrastructure System Support - CoC Planning Project	23	0			
Project / Cost Effectiveness					
Costs are within local average costs	10		Compare with SC		
Project benefits the CoC as whole	10				
Project aligns with CoC established funding principles and priorities	2		see plan and Intent Call	reference priority; Level service	
Project goals and actions are clear	3				
Project Effectiveness	25	0			
Total Application Points	120	0			



HOUSING FIRST REQUIREMENTS

Description

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold) and does not terminate program participants from the project for lack of participation in the program (e.g., supportive service participation requirements or rules beyond normal tenancy rules).

HOUSING FIRST REVIEW CHECKLIST

Name: _____

Project Name(s): _____

Documents Provided

Each organization is asked to provide evidence of how they implement Housing First in their projects. Use this checklist to indicate the type of forms that were provided for your review:

- ☐ Program Policies and Procedures
- ☐ Program Intake form
- ☐ Notices to clients (Participant Handbook, Program Rules, and Expectations, etc.)
- ☐ Termination Policy
- ☐ Sample lease agreements (PSH programs)

Other: Identify _____



Check if the statement is accurate:

Housing First: Specific Conditions at Entry

☐ does not require a minimum level of income at entry

☐ does not screen out for substance use

☐ does not screen out for criminal record except as mandated by the state (manufacture/sales of illegal substances in past 5 years, conditions related to registered sex offender)

☐ does not screen out persons with a history of victimization (DV, assault, abuse)

Reviewer Notes:

Note: Evaluation CoC funded program.

Conditions Related to Termination of Housing

☐ does not require additional steps (e.g., a required stay in transitional housing or a certain number of days of sobriety) when program participants determine that they want assistance moving into permanent housing.

☐ does not terminate housing for failure to participate in supportive services—not including case management that is for the purposes of engagement only;



☐ does not terminate for failure to make progress on a service plan;

☐ does not terminate for loss of income or failure to improve income; and

☐ does not terminate for other activities not covered in a lease agreement

Reviewer Notes:

Policies show ---

RESULTS OF REVIEW

☒ Housing First Validated: (All conditions met):

☐ Housing First Integrity documents need the following minimal corrections (e.g. no mention of a specific item needed):

Reviewer Notes:

Implementation:

Last Update:

☐ Housing First Integrity not evidenced in documents:

2024 Desk Audit Tool

Contact Information

1. Your Name:

2. Your Title:

3. Your Email:

4. Your Phone Number:

5. Agency
Name:

6. List all CoC funded Project
Names:

1. The agency has the HMIS Standard Agency Privacy Practice Notice posted on agency website.

Monitors will check to see that the agency's website has the most up to date version of the Privacy Notice posted to the agency website.

Please provide a direct link to the posting on your agency's website:

2. The agency is able to provide a list of all the HMIS users at the agency that have completed the HMIS training.

Monitors will run a report of current HMIS users at the agency and compare it with the list the agency provides.

Browse...

Staff Training and Support

3. Does your agency have a policy regarding professional development?

If so, please upload the policy.

Browse...

4. Does your agency have a system for tracking staff training attendance, such as a training spreadsheet, log or tracker?

If so, please upload a completed version.

Browse...

5. Please describe how the agency provides staff with training opportunities in the following subject areas. Please indicate whether opportunities are available to new staff, existing staff, or both. Please also note whether the opportunities are internal or external, and the frequency.

A) Diversity training: may include topics such as race, cultural, religion, sexual orientation, gender, age, etc.

A large, empty rectangular text box with a thin gray border, intended for the user to describe diversity training opportunities.

B) Best practices and evidence-base practice models: may include topics such as housing first, harm reduction, motivational interviewing, trauma-informed care, etc.

A large, empty rectangular text box with a thin gray border, intended for the user to describe best practices and evidence-based practice models.

C) Homelessness: may include housing first, HUD's definitions of homelessness, HUD's chronically homeless definition, and San Diego's Continuum of Care, etc.

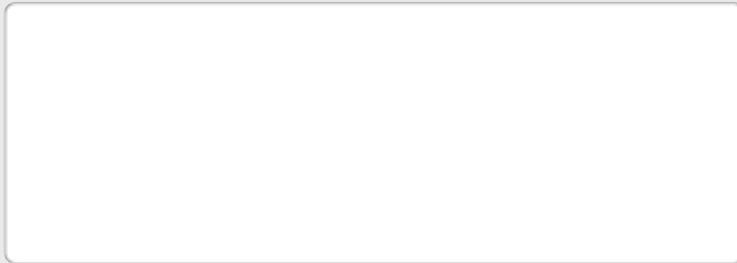
D) Other – Please explain:

If it is possible to upload evidence/documentation of the implementation of the methods you described for providing training opportunities to staff, please upload the files here. Examples of evidence/documentation may include training logs or trackers, training announcements shared with staff, sign-in sheets, certificates of attendance, or other documents. If you already uploaded a training tracker spreadsheet with question #4, you do not have to re-submit that or submit additional documentation.

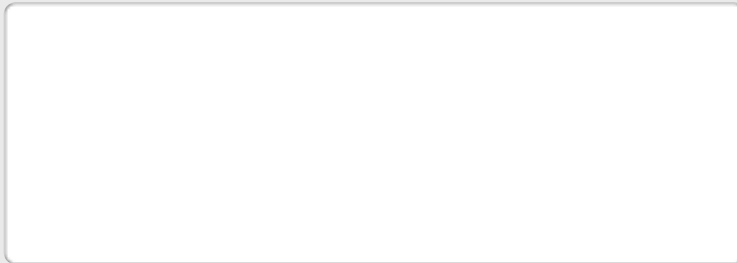
Browse...

6. Please describe how the agency helps participants meet unique needs, whether by meeting the needs internally, referring to an outside source (if so, indicate the referral source/linkage agreement), or if a staff person has responsibility for seeking resources as needs arise.

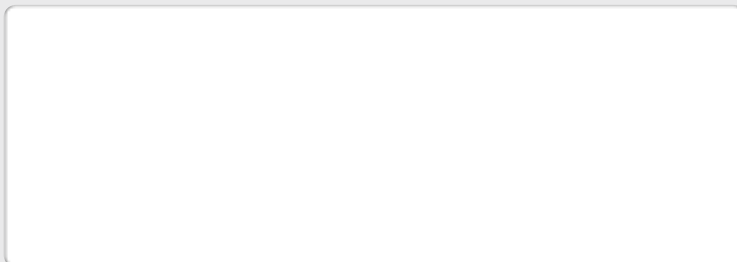
A) Psychosocial barriers (i.e. substance use counseling, psychiatric services, etc.)

A large, empty rectangular box with a thin gray border, intended for the user to provide details about psychosocial barriers and how the agency addresses them.

B) Physical disabilities

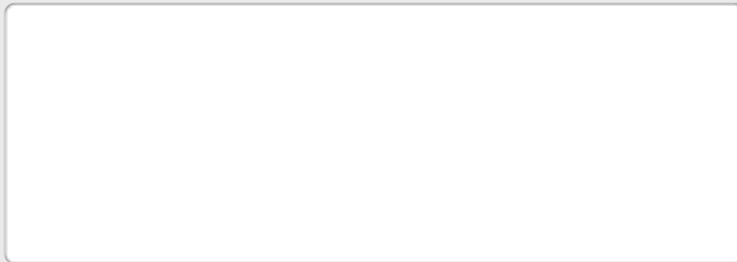
A large, empty rectangular box with a thin gray border, intended for the user to provide details about physical disabilities and how the agency addresses them.

C) Communication barriers (i.e., interpreter, bilingual materials, Braille materials, Text Telephone - TTY/TDD)

A large, empty rectangular box with a thin gray border, intended for the user to provide details about communication barriers and how the agency addresses them.

7. Please describe how the agency shares informational resources with the program participants to affirmatively further fair housing and upload resource documents.

Monitors will verify that the resources include information about who is protected, what actions are prohibited, how to file a complaint, and how to contact local fair housing enforcement agencies. For transitional housing projects, the program has resources for participants to utilize when searching for permanent housing.

A large, empty rectangular box with a thin gray border, intended for the user to describe how the agency shares informational resources.

Upload the fair housing document(s) here. Documentation may include brochures, pamphlets, fliers, training materials, etc.

Browse...

8. Please submit the menu and variety of services available to program participants.

Monitors will verify that the project makes a variety of services available to meet the range of possible service needs that the program's population may have.

Upload the menu of services.

Browse...

9. Please describe how the project conducts an annual assessment of the service needs of the program participants and adjusts services accordingly. Monitors will verify that the process includes assessment of receipt and renewal of mainstream benefits, access to health care, and a range of other possible service needs.

A large, empty rectangular box with a thin gray border, intended for the user to provide a detailed description of the project's annual assessment process.

Upload the documentation demonstrating annual assessment of service needs, such as an annual assessment template or policy/procedure for completing annual assessments. Other documentation may be acceptable.

Browse...

10. For projects that serve families, the project is able to describe and/or provide a policy or procedure to support how staff ensures the following:

A) Families with children under 18 are not separated or denied admission into housing

B) Children are enrolled in school or preschool and families are provided guidance and support in doing so

C) Families enrolled in transitional housing projects are connected to the Public Schools

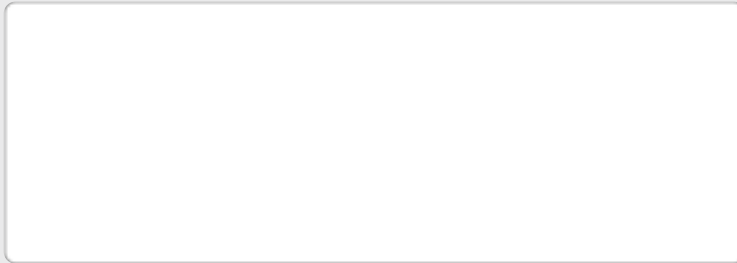
D) The project's case management model includes developmentally appropriate service planning for each member of the family

E) Children have access to developmental screening

F) Families are assisted with accessing child-care

G) The project assesses and monitors the health of children

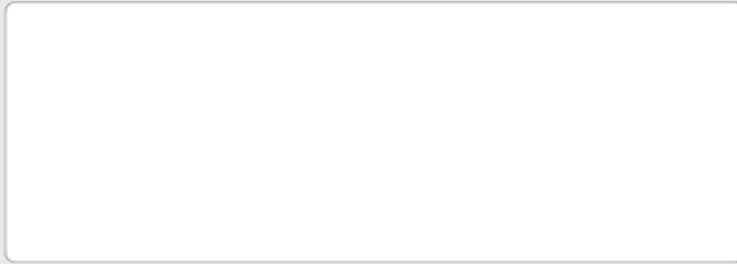
H) The project's facilities utilize space and materials to promote healthy parent-child engagement.



If you have documentation demonstrating implementation of the methods you described for supporting families, such as a policy or procedure manual, referral templates, pamphlets, or brochures, please upload the file(s) here. Other documentation may be acceptable.

Browse...

If it is difficult to upload evidence/documentation of the family supports provided, or if you were unaware that you should have a policy or procedure, please indicate that here. Indicate if there is something that can be shown to monitor during an on-site visit.



Program Management Policies

11. The agency is able to provide a policy to support period of record retention. Records pertaining to the program participant's qualification for the CoC Program are being retained for a minimum of 5 years after the expenditure of all funds from the grant under which the program participant was served. (24 CFR 578.103(c)(1))

Upload the policy or procedure for record retention here.

Browse...

12. Please select what evidence will be submitted for your Housing First Implementation evaluation for all of your CoC-funded projects. Select ALL that Apply. Note: The CoC is required to assess Housing First Implementation of all CoC-funded projects. *

- ☐ Programs/Agencies Housing First Policies and Procedures
- ☐ Program Intake Form/s
- ☐ Notices to clients (Participant Handbook, Program Rules and Expectations Agreement, etc)
- ☐ Program Termination Policies
- ☐ Template of lease/ occupancy agreements used (TH and PSH programs only)
- ☐ Other - Write In (Required)

13. Please attach all Housing First evidence to be assessed here. *

Browse...

Additional Comments

12. Please provide any comments or questions.



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Performance Improvement Plan and Reallocation Policy

Context

HUD regulations (24 CFR 578) require the Coe to identify and take action against poorly performing projects. Some projects in 2021 did not achieve at least 60% of points from a possible 119 points.

The 2021CoC Application received the majority of points available in many sections such as structure, coordination, rating and ranking, and HMIS, but the application lost points for System Performance. This impacts HUD funding for the Coe and all applicants, particularly for bonus funds and the selection of projects for funding in Tier 2.

To meet the mandate to 'take action' other than automatic rejection of the project; and to help strengthen project performance and as a result Coe performance, a PIP requirement is being added to the 2023 Rating and Ranking process.

Performance Improvement Plan Overview

When will a Performance Improvement Plan (PIP) be required?

A PIP will be required when the overall score of a project application does not meet a minimum benchmark set by the Rating and Ranking Group. The benchmark is set annually prior to the review of Applications. For the 2023 CoC funding cycle, the benchmark is set at 55% of the total possible points available.

Are All Project Applications Subject to the PIP requirement?

Projects that have operated for less than one year, referred to as LTOY. Because these projects have not completed a year of service, there is little or no Annual Performance data to score. As a result, LTOY projects will not be subject to the PIP process for that NOFO cycle.

New project applications, like LTOY, are not subject to a PIP.

While infrastructure projects, like the HMIS and CES, have completed more than a year of service, the criteria for evaluation differs substantially. As a result, they are not subject to the standard PIP process but may be asked to suggest remedies for areas identified as needing improvement.

How will an Applicant know if a project must submit a PIP?

When a Project Application does not meet the benchmark set for that year, the Rating and Ranking Group will determine if a PIP is required, and request that the Applicant be notified that a PIP is needed. This notification will be included in the Initial Notice of Acceptance or Rejection issued to each Applicant. HUD requires this notice to occur at least 15 days prior to the federal due date for submission of the Coe Application.



When is a PIP submitted?

After an Applicant receives notice that a PIP is required, time is of the essence. Because HUD strongly recommends that the Coe submits the Coe Application at least 48 hours in advance of the federal due date. A draft PIP, subject to revision if deemed necessary, will be due at least 72 hours in advance of the federal due date. The Coe typically adjusts the Initial Notice of Acceptance or Rejection to reflect the 48-hour advance submittal. As a result, the Applicant will have approximately two weeks to prepare and submit a draft PIP.

What happens if a PIP is not submitted?

Timely submittal of a PIP is a threshold requirement. Applicants failing to submit a PIP for a project when required, do not meet the threshold for submittal in the CoC Application, and are subject to not being included in the application submitted to HUD. Because this has significant repercussions for the Coe, applicants must take submission of the PIP seriously.

Who completes the PIP?

The Project Applicant is responsible for completing and submitting the PIP following guidelines established in the basic requirements.

What are the basic requirements of a PIP?

The PIP must address the following topics:

- A. Identify the Applicant agency, the Project Name and Project Type, and any subrecipients included in project implementation.
- B. Identify the scoring elements where the project did not score well.
Identify elements where performance was less than 50% of the benchmark. Be specific.
- C. What specific, measurable actions to be taken prior to the 2024 NOFO submittal to improve performance on these scoring elements.
Specific measurable action statements must include action(s) that can be numerically measured and evidenced. For example, "Within 60 days, ABC agency will review the change in income variable of 10 randomly selected client files and determine and record common characteristics that might be impacting the outcome. ABC will identify and implement actions that can be taken to improve the outcome." So, for example, If it is determined that files often are missing data (i.e. the staff knows that clients increased non-employment income but it is not recorded in HMIS) the agency could take an action to improve the HMIS entry (train staff about the importance of recording income, determine if there are particular staff who need to be reminded, schedule periodic file review).
- D. When scoring elements not meeting 55% of the benchmark are related to direct client services, describe how your agency will include both staff and participants or persons experiencing homelessness in identifying potential solutions.
For example, if exits to permanent housing are low, ABC agency will ask for staff and consumer input through a focus group or anonymous comment cards.



- E. Identify the lack of resources or operational challenges which are clearly attribute the shortfall in performance.

For example, during the Pandemic, ABC agency struggled to hire and retain qualified staff. The limited staff available were focused on direct delivery of client services rather than HMIS data entry. To remedy this situation, ABC agency will set aside a minimum of 2 hours per week on a regular day/time for data entry.

Another example: ABC agency has access to only one computer capable of HMIS data entry. To remedy this situation, ABC will explore possible in-kind donations or sharing of resources with another organization.

- F. Identify the date the agency will submit a progress report(s) one of which is within six months of the Coe Application submittal. **For the FY 2023 NOFO the Rating and Ranking Group has requested a final progress report be submitted by June 3,2023**
- G. Submit the progress report data and verification documents to show progress by the date selected.
- H. Propose a self-reallocation plan for project funds if there has not been measurable progress within 10 months after the submittal of the Coe Application.

What happens after a PIP is submitted?

- A. The Rating and Ranking Group (R&R) will review the PIP to ensure it is complete and contains measurable actions. If the review finds that response is missing or actions are not measurable, the Applicant will be asked to revise and resubmit the PIP.
- B. If the Rating & Ranking Members or NOFO Team have suggestions for resources or remedies of the challenges in section E, they will be shared with the Applicant.
- C. If a progress report has not been received, the RTFH will contact the Applicant halfway through the year to 'check-in' on progress.
- D. The PIP results will be considered during the next Coe Rating and Ranking cycle. If the PIP has not been implemented or the actions did not improve the project score in the rating process, the project is subject to reallocation.



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PERFORMANCE IMPROVEMENT PLAN INVOLUNTARY REALLOCATION POLICY

Performance Improvement Plan Failure Reallocation Policy

Policy Statement: Projects falling below the overall performance benchmark for inclusion in the application for funds, may be provisionally included in the application based on completion of a Performance Improvement Plan (PIP). Projects that complete their PIP, but fail to reach the overall performance benchmark after completing their initial PIP, will be allowed one additional year to improve overall performance. Projects failing to meet the overall benchmark after completing their second PIP will be involuntarily reallocated.

Protocol

Projects failing to meet the overall performance benchmark, set at 55% of the overall points available in the annual review are required to submit a Performance Improvement Plan (PIP) prior to inclusion in the annual application for funds. These plans include measurable actions designed to address areas where project performance falls at less than 50% of the benchmark for a specific performance area. Project applicants prepare, submit, track performance, and report on completion of their PIP actions.

The project PIP reports, subsequent project review, and scoring during the annual application process assess whether or not the project performance has exceeded the PIP Benchmark for that year, or falls below the benchmark. Projects falling below the overall performance benchmark at the end of the initial PIP, will be required to prepare and submit a second PIP that meets the basic requirements of the PIP as outlined in PIP guidelines seen above.

Once submitted, the PIP is reviewed by the R&R /NOFO Team, who determines if:

- The plan follows PIP guidelines;
- The plan contains clear, measurable actions designed to improve capacity;
- Actions are anticipated to have positive impact on performance;
- Conditions impacted performance were noted with potential remedies;
- The plan contains specific dates for reporting; and
- The plan includes self-reallocation if needed during the next renewal cycle.

When the PIP is approved, the project can be included in the annual application. If an acceptable PIP is not received, the project is subject to removal from the rank order.

When a project is required to complete a PIP during two annual application cycles, failure to meet the overall project benchmark at the end of the second PIP, will result in involuntary reallocation of the project.

The Performance Improve Plan Commitment Form, PIP, Progress Report, and Self-Reallocation Plan templates can be found below.



Performance Improvement Plan (PIP) Commitment Form

Mental Health Systems Inc.

Applicant Agency

Subrecipients, if Applicable

S+CI 1

Project Name and Project Type

Shola.olaoshebikan@tumbhs.org 858-408-5101

Responsible Member's email address and phone number

I acknowledge projects falling below the overall performance benchmark for inclusion in the application for funds, may be provisionally included in the application based on completion of a Performance Improvement Plan (PIP). Projects that complete their PIP, but fail to reach the overall performance benchmark after completing their initial PIP, will be allowed one additional year to improve overall performance. Projects failing to meet the overall benchmark after completing their second PIP will be involuntarily reallocated. As part of the PIP process, I also acknowledge a project will also be required to propose a self-reallocation plan for funds if there has not been measurable progress within 10 months after the submittal of the Coe Application.

Shola Olaoshebikan, Executive Vice President

Print Responsible Member's Name and Job Title


olushola Olaoshebikan (Jun 3, 2024 13:58 PDT)

Responsible Member's Signature

06/03/2024

Signature Date



Performance Improvement Plan

Applicant Agency:	Mental Health Systems Inc.
Subrecipient/s:	
Project Name and Project Type:	S+CII -PSH
Deadline to Submit Progress Report:	June 3rd, 2024

Performance Improvement Plan {PIP}

IMPROVEMENT AREAS

(Scoring Category
below

50% benchmark, 0 pts)

ACTIONS TO BE TAKEN

Include measurable indicators and
timeframes for progress

If performance shortfall is related to direct

client services, describe how your agency will
include both staff and service recipients in
identifying solutions

If shortfall is related to lack of resources

or operational challenges, please describe
and indicate proposed solution.

#18 Increased Earned Income for project leavers	Housing staff will review data in HMIS and update any income increases on a monthly basis.	The housing coordinator will continue to check-in with recipients regarding any new updates related to income increases and update the information in HMIS .	It is important to note that lack of staffing continues to be an issue resulting in staff focusing on direct participant services and not HMIS. We will work on recruiting qualified housing staff we will ensure time[and thorough training on HMIS.
#26 Project has reasonable costs per permanent housing exit as defined locally	Project has reasonable costs per permanent housing exit as defined locally- Housing Team will meet with fiscal department at a minimum of quarterly to ensure reasonable costs. Housing staff will also work with Housing leadership to ensure outcomes are met.		Communication between the housing team and fiscal department will ensure reasonable costs per permanent housing exit.
#31-33 Project dedicated to Priority Vulnerable Population - DV, CH, and Seniors	The Project is dedicated to serve vulnerable populations. The Program is contractually obligated to serve adults age 25-59 with a severe mental health diagnosis that may include multiple hospitalizations and chronic homelessness. San Diego County has a specialized 60+ senior ACT program that North Star ACT		Program leadership and housing staff will receive training related to HMIS system and inputting information as soon as possible.



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	<p>may refer older adults to San Diego County Senior ACT program.</p> <p>The program will continue to enter the appropriate data within the HMIS system.</p>		
#36 System Priority – HOUSING Leverage	<p>The housing team will identify resources and provide evidence to fulfil the 25% alternative funding.</p> <p>The program utilizes MHSA funding to assist recipients. Housing staff will receive training to input the required information regarding housing leverage.</p>		
#30 Serves High Need Populations	<p>The program will continue to enter the appropriate data within the HMIS system regarding participants with zero income at entry.</p>		<p>Program leadership and housing staff will receive training related to HMIS system and inputting information as soon as possible</p>
#28 Serves High Need Populations	<p>Minimum percent of participants entering project from place not meant for human habitation -Housing staff will immediately review all HMIS data and ensure that the information is accurate. Program will sometimes utilize transitional housing as a first placement for participants coming from a place not meant for habitation as an immediate solution due to lack of permanent housing availability.</p>		
#35 Integrates Health Leverage (Has MOU)	<p>Housing staff integrates Health leverage with every recipient. The program has a partnership with Vista Community Clinic, TruCare, and Neighborhood Health Care. The MOU will be established within 30-60 days.</p>		



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#24 CoC Review - management; documentation	Leadership will provide training to housing staff regarding record keeping and documentation related to individuals and families who are homeless and or at risk of homelessness. Housing leadership and team will review hmis data to be in compliance on a monthly basis.		It is important to note that there was a lack of staffing and significant turn-over in the housing department. We have restructured the housing team and we are providing bi-weekly training agency wide.
#27 Project Effectiveness - Returns to Homelessness	Leadership will provide training to housing staff regarding specific outcomes related to recipients returning to homelessness. Housing leadership and team will review hmis data to be in compliance on a monthly basis.		
#25 Project Effectiveness Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	<p>Housing Team will immediately begin working with our program fiscal department to ensure compliance of funding drawdown occurs, Final drawdown report will be uploaded to DropBox.</p> <p>Housing Team (PM,VP,EVP) will meet with fiscal department at a minimum quarterly to ensure fiscal compliance is achieved.</p>		Agency restructured housing department and the program will review updates in monthly budget program reviews and also ensure at minimum a quarterly meeting to discuss housing funding.



Progress Report

Project Name: MHS TURN S+C II

IMPROVEMENT AREA	GOAL MET	MEASUREMENT OF SUCCESS Please share the measures that support progress toward improvement/achievement of the goal.	If the goal has not been met/progress has not been made, what actions do you propose to take?	List Attached Evidence
- #18	Y	<ul style="list-style-type: none"> - Leadership continues to recruit qualified staff; 1 additional Housing Specialist onboarding - All housing staff took introductory or refresher training for HMIS Training was conducted in group, individual, and in-vivo sessions - All staff supported with updating Income Verification for each client 	NA	<ul style="list-style-type: none"> - Luis Leyva Clarity - Lisbeth Flemate Clarity - Diana Cortez Clarity - Income Tracker - Income Verification
- #26	Y	<ul style="list-style-type: none"> - Housing Coordinator attended monthly pre-budget meetings - All housing staff meet monthly to review rent collected and budget updates; monthly rent tracker updated and submitted to Accounts Receivable Dept - VP, PM, HC attend weekly update meetings specific to S+C budget and vacancy 	- NA	- NSA Maintenance Needs
- #31-#33	Y	<ul style="list-style-type: none"> - All clients entered into HMIS - All housing staff took introductory or refresher training for HMIS Training was conducted in group, individual, and in-vivo sessions - All 60+ year old clients were assessed and referred to older adult ACT program, PACE, or stepped down, as appropriate 		<ul style="list-style-type: none"> - Luis Leyva Clarity - Lisbeth Flemate Clarity - Diana Cortez Clarity - 722 Demographics - Observation of Homeless Status - Self Certification of Homeless Status - Third Party Verification of Homeless Status - Verification of Disability
- #36	Y	<ul style="list-style-type: none"> - Occupancy Ledger is submitted monthly to Accounts Payable Dept and cross referenced to HMIS reports - Housing Team have relationships with alternative housing options (i.e Sober Homes, Independent Living Homes, Board & Care, etc) - Weekly Housing meetings 	- NA	<ul style="list-style-type: none"> - June 2024 Occupancy Ledger - NSA Maintenance Needs

- #30	Y	<ul style="list-style-type: none"> - All housing staff took introductory or refresher training for HMIS Training was conducted in group, individual, and in vivo sessions - All staff supported with updating Income Verification for each client, to include Zero Income Verification, if appropriate 	- NA	<ul style="list-style-type: none"> - Luis Leyva Clarity - Lisbeth Flemate Clarity - Diana Cortez Clarity - Zero Income Verification
- #28	Y	<ul style="list-style-type: none"> - All clients entered into HMIS - All clients meet with Housing Coordinator upon intake to review housing needs 	- NA	<ul style="list-style-type: none"> -Housing Files Checklist -Housing Intake Form
- #35	Y	<ul style="list-style-type: none"> - Every client not connected to PCP is referred - Every client connected to PCP is offered to sign Authorization to Disclose for coordination of care - Executed MOU TrueCare 	- NA	<ul style="list-style-type: none"> -PCP Coordination Form -MOU – TC & MHS
- #24	Y	<ul style="list-style-type: none"> - Trainings are scheduled at regular intervals, or as needed - HC runs HMIS reports monthly - Next Steps Biweekly coordination 	- NA	<ul style="list-style-type: none"> -NSA Internal Trainings -722 Demographics -Net Steps Housing Sign in Sheet
- #27	Y	<ul style="list-style-type: none"> - HC runs HMIS reports monthly - Leadership reviewed Statement of Work with all staff, focusing on outcomes and objectives or service delivery 	- NA	<ul style="list-style-type: none"> -722 Demographics -SOW Review Sign In -Training Sign In
- #25	Y	<ul style="list-style-type: none"> - VP/PM/HC attend monthly pre-budget meetings - EVP/VP/PM attend monthly budget meetings with full fiscal team 	- Drawdown will resume, effective HUD approval	-NSA Maintenance Needs



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Proposed Self- Reallocation Plan

Applicant Agency

Project Name and Project Type

Proposed Plan

CURRENT BUDGET		PROPOSE NEW BUDGET	
Budget line item	Current Amount	Budget line item	New Amount
Leasing		Leasing	
Rental Assistance		Rental Assistance	
Supportive Services		Supportive Services	
Operating Costs		Operating Costs	
HMIS Admin		HMIS Admin	
TOTAL		NEW TOTAL	
Total Reallocated Amount (back to the Coe)			

olushola Olaoshebikan

Print Authorized Signer's Name


[olushola Olaoshebikan \(Jun 3, 2024 13:58 PDT\)](#)

Authorized Signature

EVP

Authorized Signer's Job Title

06/03/2024

Signing Date






Performance-Improvement-Plan-and-Reallocation-Policy-Updated-8.23.2023 MHS.TURN 9.25.23 S.CII PROGRESS REPORT

Final Audit Report

2024-06-03

Created:	2024-06-03
By:	Evelyn Ibarra (evelyn.ibarra@turnbhs.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-1Vrj6z9rsRUQEETXArKNSilJ2a71CmO

"Performance-Improvement-Plan-and-Reallocation-Policy-Updated-8.23.2023 MHS.TURN 9.25.23 S.CII PROGRESS REPORT" History

-  Document created by Evelyn Ibarra (evelyn.ibarra@turnbhs.org)
2024-06-03 - 8:53:21 PM GMT
-  Document emailed to olushola Olaoshebikan (shola.olaoshebikan@turnbhs.org) for signature
2024-06-03 - 8:53:29 PM GMT
-  Email viewed by olushola Olaoshebikan (shola.olaoshebikan@turnbhs.org)
2024-06-03 - 8:56:33 PM GMT
-  Document e-signed by olushola Olaoshebikan (shola.olaoshebikan@turnbhs.org)
Signature Date: 2024-06-03 - 8:58:08 PM GMT - Time Source: server
-  Agreement completed.
2024-06-03 - 8:58:08 PM GMT

FY 2024 Furthering Equity Report Form

Please complete this form to the best of your ability. Once complete, please save the document in PDF format and upload to your agency's FY 2024 NOFO "Equity Evidence" Dropbox subfolder with other attachments.

Agency Name:	Interfaith Community Services
Name of Person Submitting Form:	Lauren Varner
Job Title of Person Submitting Form:	Director of QA, Compliance, and Grants

Section I: Agency Leadership, Governance, Staff, and Policies

1. Does your agency currently have an existing Diversity, Equity, and Inclusion Policy, Yes or No?

If so, please attach evidence of your organization's current DEI policy. If a DEI Policy does not currently exist at your agency, please provide us with more information explaining why.

Yes; please see the uploaded documents. In January 2023, the agency released a DEIA Statement, which serves as our formalized, organizational commitment to Diversity, Equity, Inclusion, and Anti-Racism. Additionally, Interfaith has developed a microaggression policy that focuses on providing education around microaggression to all staff. The policy also identifies means for reporting and addressing issues.

2. Does your agency currently have under-represented individuals (BIPOC, LGBTQ+, etc.) in managerial, leadership, and front-line staff positions that reflect the populations your agency serves? Please provide us with a narrative describing the specific populations your agency serves, information regarding your agency's assessment of the compositional breakdown of your agency's staff (managerial, leadership, and front-line staff) and board, and how your agency measures success/outcomes in this area. We also ask that you provide us with data from your assessment in the following data charts provided.

The Agency currently does have under-represented individuals serving as front-line staff and in managerial roles throughout the agency, which is representative of the populations Interfaith serves (please refer to staffing charts below).

Last fiscal year, Interfaith's client population included the following:

- 10.5% African American
- 59% Hispanic/Latino/e/o
- 51% Females
- 6% Non-Traditional or Non-Conforming Gender identities
- 8% Transition Age Youth
- 35% Persons with disabilities
- 25% Persons experiencing homelessness
- 10% Persons 65 years+

As part of the efforts of a staff-led Diversity Equity Inclusion & Anti-Racism (DEIA) Working Group, Interfaith's recruitment and hiring policies and procedures were reviewed to ensure they promote equity and diversity in the workforce, reduce barriers to entry, and are fully accessible. One of the first priorities of the DEIA WG was

to remove employment barriers to increase equity and diversity. This included the re-evaluation of various hiring practices to be more inclusive. Beginning in 2021, Interfaith partnered with Success Beyond Measure, Inc, a diversity consulting firm, to continue its DEIA journey. Success Beyond Measure facilitated staff listening sessions, which informed further goals and initiatives of the DEIA WG. Interfaith implemented anti-racism training for all staff (195 staff during the initial training roll-out) and the training is integrated into onboarding. The DEIA WG also established a DEIA resource library and Latinx staff affinity group.

Front-Line Staff Composition		
Organizations define which roles are considered front-line staff positions. Ensure consistency in categorizations and avoid duplication when reporting.		
Demographic Category	Total Number	%
Black, African American, or African	21	10%
Hispanic/Latina/e/o	93	44%
Female	137	66%
Male	68	32%
Non-Traditional or Non-Conforming Gender identities (e.g. Culturally Specific Identity, Transgender, Non-Binary, Questioning, or Other)	4	2%
Persons with a Disability	8	4%
Persons with Lived Experience of Homelessness	43	21%
Persons 18 and under and Transitional Age Youth (18-24)	17	8%
Persons 25-54 years of age	146	70%
Persons 55 years of age and older	46	22%

Manager and Leadership Composition		
Positions include managerial and leadership roles in the organization and board. Ensure consistency in categorizations and avoid duplication when reporting.		
Demographic Category	Total Number	%
Black, African American, or African	1	2%
Hispanic/Latina/e/o	18	38%
Female	33	70%
Male	14	30%
Non-Traditional or Non-Conforming Gender identities (e.g. Culturally Specific Identity, Transgender, Non-Binary, Questioning, or Other)	0	0%
Persons with a Disability	0	0%
Persons with Lived Experience of Homelessness	6	13%
Persons 18 and under and Transitional Age Youth (18-24)	0	0%
Persons 25-54 years of age	36	77%
Persons 55 years of age and older	11	23%

3. Does your agency currently have a relational process for receiving and incorporating feedback from persons with current or lived experiences of homelessness? Please provide us with a narrative detailing the various methods used to incorporate feedback from persons with lived experience of homelessness to help inform

policy and decision making. The narrative should include an example, of how feedback was used to help improve policy, protocols, or program design/s. Please also attach evidence of current feedback methods used (Ex: Existing Participant Feedback Surveys, Examples of a past Lived Experience Solicitation for Feedback/Forum meeting invitations, Meeting Agenda, etc.). **Please make sure not to submit any documentation that includes personally identifiable information of clients served (or persons with lived experience of homelessness).**

Yes, the agency uses several methods to incorporate client feedback including customer satisfaction surveys, resident meetings, and a thorough grievance and appeal process so we may understand issues that clients are experiencing and make needed improvements. Program leadership reviews client satisfaction surveys on a regular basis to incorporate feedback as much as possible. Interfaith has updated several policies based on direct client feedback including program termination/exit policies, staff training requirements, and policies surrounding staff roles and responsibilities. In addition to internal agency methods, Interfaith also participates as a provider utilizing a Pulse for Good Kiosk, which is positioned at Interfaith's main office location. Please see uploaded customer satisfaction surveys. In 2024, Interfaith also instituted a system called Safe Hotline, which is an anonymous way that anyone can provide feedback to the agency.

Section II: Program Participant Outcomes

4.a. Has your agency reviewed program level data (data by race, ethnicity, gender identity, age and/other underserved populations) with an equity lens and identified any potential programmatic changes needed to make program participant outcomes more equitable? (e.g. a review of how persons are served and move through the program to permanent housing or achieve housing stability with an equity lens using HMIS data). Please provide us with a narrative describing your agency's review and results.

The Agency reviews agency-wide demographic data at least annually. In July 2024, Interfaith created a framework for a new Quality Assurance Committee that will have an emphasis on alignment to our DEIA values. Part of the duties of the committee will be to review program-level data related to the following:

- **Service Delivery Metrics:** Evaluation of how well the agency meets its service delivery goals, including timeliness, accessibility, and adherence to standards.
- **Client Satisfaction:** Results from surveys or feedback forms indicating the satisfaction levels of clients who receive services.
 - **Improvement Projects:** Integrating and monitoring results, including successes and areas for development, of Quality Assurance and DEIA principles throughout the organization.
- **Outcome Measures:** Data on the effectiveness of services in achieving the intended outcomes for clients.

4.b. Expanding on question 4.a., what actions have been taken or will be taken to develop and implement equitable program policies that do not impose undue barriers? Please provide a narrative describing your agency's action plan.

Interfaith Community Services has been working in the realm of Diversity, Equity, Inclusion, and Anti-Racism (DEIA) for the past three and a half years. During that time, we have taken several important steps to ensure that our organization is consistently striving to demonstrate greater levels of equity as a workplace and in our

approach to providing vital services and resources to our clients. In January 2023, the agency released a DEIA Statement, which serves as our formalized, organizational commitment to Diversity, Equity, Inclusion, and Anti-Racism. Program policies are being reviewed on an ongoing basis to ensure consistency with this statement and to ensure our clients experience no undue barriers to receiving services. Interfaith contracts with a DEIA consultant to provide direct support and review of policy alignment with Interfaith's goal of being an inclusive, equitable, and diverse environment dedicated to dismantling systems of oppression.



HOUSING
INNOVATION
PARTNERS

Housing Innovation Partners
5151 Murphy Canyon Road Suite #120
San Diego, CA 92123

COMMITMENT TO FURTHERING EQUITY, INCLUSION, and EQUAL ACCESS For OVERREPRESENTED and UNDERSERVED HOMELESS PERSONS

The Advisory Board (Board) for the San Diego City and County Continuum of Care (CoC) and the Regional Task Force on Homelessness (RTFH), as the Collaborative Applicant, have taken action to evaluate racial, ethnic, and gender disparities in the CoC system. Subsequent to the evaluation, the Board adopted a series of recommendations from the Ad Hoc Committee: Addressing Homelessness Among Black San Diegans. A revision to the rating factors for applicants for CoC funding reflects the action taken by the Board and strives to implement action by service agencies throughout the CoC.

To reduce barriers in equal access to housing and services experienced by groups who are over-represented and under-served by the CoC, the 2022 Rating and Ranking criteria includes measures of commitment to specific actions from Project Applicants to furthering equity, inclusion, and equal access. These actions reflect those adopted by the Board.

To promote equity of access to and provision of housing and service throughout the CoC, the (ORGANIZATION NAME) commits to the following actions within the next 12 months: *(check all that are applicable to your commitment)*.

☒ Expand training opportunities for all staff with a particular focus on front-line program staff on specific diversity, equity and inclusion topics, such as implicit bias, creating an equitable culture, understanding the effects of racial trauma, Anti-racism and Anti-oppression, and responding to persons with disabilities.

☒ Review agency documents to assess if program policies, practices and procedures are inclusive and sensitive to the various cultures of those receiving homeless services, and update policies as necessary to ensure inclusion and sensitivity.

☒ Identify barriers to participation faced by under-served groups, including but not limited to racial, ethnic, gender, and persons with disabilities, and amend agency policies and protocols to reduce these barriers.

☒ Provide training on recruiting practices to support diversifying front-line staff and leadership.

☒ Participate in training on Equal Access and Anti-Discrimination offered by the CoC.

As an authorized representative of (agency name), I certify that the organization will take the actions as indicated above and to retain evidence of these actions for review by the CoC.

Signed: Kimberly A. Russell-Shaw

Date: August 6, 2024

Printed Name: Kimberly Russell-Shaw

Title: Executive Director



Housing First Standards Assessment Tool

Overview: This tool aims to assess and document how closely a housing and service provider adheres to the recommended best practice standards of the Housing First model, in the context of the broader work to implement a Housing First orientation at the system-level. This tool specifically evaluates project-level fidelity to Housing First, which directly impacts a system’s fidelity to Housing First. In addition to the universal best practice standards identified in this tool, Continuums should also take into account their local community context and local written standards pertaining to Housing First when assessing projects. A Continuum of Care can use this tool to prompt discussion

Provider Info tab: The Provider Information tab should be completed *prior* to beginning the assessment. Specifically, the *Project Name, Project Type, Target Sub-Population served, and Date of Assessment* fields need to be completed in order to populate the assessment standards and report summary with questions that are specific to the project type and population. Please complete this section prior to printing any standards for assessment.

Standards: The standards have been arranged into the following categories: *Access, Evaluation, Services, Housing, Leases, and Project-Specific*. The “Tab” chart at the bottom of this page describes each of the categories in more detail. Some of the categories are not applicable for all project types, and those standards do not need to be

Project Type	Applicable Standards
Coordinated Entry	Access & Evaluation; Project-specific
Street Outreach	Access & Evaluation; Project-specific
Emergency Shelter	Access & Evaluation; Service & Housing; Project-specific
Transitional Housing	Access & Evaluation; Service & Housing; Leases; Project-specific
Rapid Rehousing	Access & Evaluation; Service & Housing; Leases; Project-specific
Permanent Supportive Housing	Access & Evaluation; Service & Housing; Leases; Project-specific

Safeguarding: Please keep in mind safeguarding concerns when assessing projects. In particular, we advise Continuums of Care to work with projects with victims of domestic violence to make sure that adequate safety and confidentiality policies and practices are in place before beginning assessments.

Scoring: For each standard, there are three scoring criteria: “Say It”, “Document It”, and “Do It” (as explained further below). To show that a project is in full compliance with each standard, the assessor should mark “Always” for each scoring criteria. Use the drop down in the three columns to the right to select “Always” or “Somewhat” or "Not at

- “*Say It*” means that project and agency staff can describe verbally what they do concerning each standard. The assessor should be able to identify that the organizational culture supports the standard by how staff talks about what is done.
- “*Document It*” means that there is written documentation that supports the project’s compliance with each standard. Written documentation could include Policies and Procedures, Personnel Handbooks, Professional Development Plans, Project Rules, etc.

- “*Do It*” means that the assessor was able to find evidence that supports the project’s compliance with each standard. Evidence could include information contained in client or other administrative files, client acknowledgement that something is being done, staff can point to documentation that supports implementation of the standard, etc.

Assessor Notes: A cell below each individual standard allows the assessor to add optional notes about the information collected for that particular standard. The notes can include where information was found, what questions were asked, who answered the questions, what additional information is needed to be able to mark that standard as

Tab	Description	Purpose
Instructions	Tool overview and aim	Offers instruction to users on the assessment tool
Provider Info	Input provider, project and general assessment information	Determines project-specific standards for consideration
Standards - Access & Evaluation	Input compliance with standards concerning participant access to the project and input, project evaluation and performance management	Assesses whether access and evaluation are compliant with Housing First principles
Standards - Leases	Input compliance with standards concerning the lease and occupancy agreements, where applicable	Assesses whether leases and occupancy agreements are compliant with Housing First principles
Standards - Services & Housing	Input compliance with standards concerning the service and housing models and structure, where applicable	Assesses whether services and housing are compliant with Housing First principles
Standards – Project-Specific	Prompts assessment standards based on project type and targeted sub-populations served by the project, where applicable	Assesses whether specific project standards are compliant with Housing First principles
Report Summary	Displays assessment scores and conclusions, and highlights non-compliant standards	Printable summary of the assessment



Provider Information

Please complete the information below on the organization being assessed.

Provider Information	
Provider's Legal Name	[Test Provider]
Acronym (If Applicable)	
Year Incorporated	
EIN	
Street Address	
Zip Code	

Project Information	
Project Name	
Project Budget	
Grant Number	
Name of Project Director	
Project Director Email Address	
Project Director Phone Number	
Which best describes the project *	Rapid Rehousing
If project is a Safe Haven, please choose project type that it most operates like, e.g. shelter, transitional housing, or permanent housing	
Are your services targeted to any of the following populations specifically? Please select one if so, as this impacts your assessment questions.	
People in Recovery	

*Please note that when you select a project type, particular standards may not be relevant.

Management Information	
Name of CEO	
CEO Email Address	
CEO Phone Number	

Name of Staff Member Guiding Assessment	
Staff Email Address	
Staff Phone Number	

Assessment Information	
Name of Assessor	
Organizational Affiliation of Assessor	
Assessor Email Address	
Assessor Phone Number	
Date of Assessment	Nov 02 2016



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

No.	Standard	Access Definition / Evidence	Say It	Document it	Do it
Access 1	Projects are low-barrier	Admission to projects is not contingent on pre-requisites such as abstinence of substances, minimum income requirements, health or mental health history, medication adherence, age, criminal justice history, financial history, completion of treatment, participation in services, “housing readiness,” history or occurrence of victimization, survivor of sexual assault or an affiliated person of such a survivor or other unnecessary conditions unless required by law or funding source. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 2	Projects do not deny assistance for unnecessary reasons	Procedures and oversight demonstrate that staff do everything possible to avoid denying assistance or rejecting an individual or family for the reasons listed in Access Standard #1. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 3	Access regardless of sexual orientation, gender identity, or marital status	Equal access is provided in accordance with the 2012 and 2016 Equal Access Rules, meaning that any project funded by HUD must ensure equal access for persons regardless of one’s sexual orientation or marital status, and in accordance with one’s gender identity. Adult only households, regardless of marital status, should have equal access to projects (if these project types are not available within a CoC, the CoC should conduct an assessment to determine if these project types are needed and work with providers to accommodate the need). Please see Equal Access Rules here: https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/ <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 4	Admission process is expedited with speed and efficiency	Projects have expedited admission processes, to the greatest extent possible, including helping participants obtain documentation required by funding sources, as well as processes to admit participants regardless of the status of their eligibility documentation whenever applicable. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Access 5	Intake processes are person-centered and flexible	Intake and assessment procedures are focused on the individual’s or family’s strengths, needs, and preferences. Projects do not require specific appointment times, but have flexible intake schedules that ensure access to all households. Assessments are focused on identifying household strengths, resources, as well as identifying barriers to housing that can inform the basis of a housing plan as soon as a person is enrolled in the project.	Please select answer	Please select answer	Please select answer

Optional notes here					
Access 6	The provider/project accepts and makes referrals directly through Coordinated Entry	Projects actively participate in the CoC-designated Coordinated Entry processes as part of streamlined community-wide system access and triage. If these processes are not yet implemented, projects follow communities' existing referral processes. Referrals from Coordinated Entry are rarely rejected, and only if there is a history of violence, the participant does not want to be in the project, there are legally valid grounds (such as restrictions regarding sex offenders) or some other exceptional circumstance that is well documented.	Please select answer	Please select answer	Please select answer
Optional notes here					
Access 7	Exits to homelessness are avoided	Projects that can no longer serve particular households utilize the coordinated entry process, or the communities' existing referral processes if coordinated entry processes are not yet implemented, to ensure that those individuals and families have access to other housing and services as desired, and do not become disconnected from services and housing. Households encounter these exits under certain circumstances, such as if they demonstrate violent or harassing behaviors, which are described within agencies' regulation-adherent policies.	Please select answer	Please select answer	Please select answer
Optional notes here					
Name		Participant Input Definition / Evidence	Say It	Document it	Do it
Participant Input 1	Participant education is ongoing	Project participants receive ongoing education on Housing First principles as well as other service models employed in the project. In the beginning of and throughout tenancy, participants are informed about their full rights and responsibilities as lease holders, including the potential causes for eviction.	Please select answer	Please select answer	Please select answer
Optional notes here					
Participant Input 2	Projects create regular, formal opportunities for participants to offer input	Input is welcomed regarding the project's policies, processes, procedures, and practices. Opportunities include involvement in: quality assurance and evaluation processes, a participant leadership/advisory board, processes to formally communicate with landlords, the design of and participation in surveys and focus groups, planning social gatherings, integrating peer specialists and peer-facilitated support groups to compliment professional services.	Please select answer	Please select answer	Please select answer
Optional notes here					



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

Standard		Lease and Occupancy Definition / Evidence	Say It	Document It	Do It
Leases 1	Housing is considered permanent (not applicable for Transitional Housing)	Housing is not time-limited (though rent assistance may be) and leases are automatically renewable upon expiration, except with prior notice by either party. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 2	Participant choice is fundamental	A participant has, at minimum, choices in deciding the location and type of housing based on preferences from a range of housing types and among multiple units, as available and as practical. In project-based settings, participants should be offered choice of units within a particular building, or within the portfolio of single site properties. In projects that use shared housing, i.e. housing with unrelated roommates, participants should be offered choice of roommates, as available and as practical. Additionally, as applicable, participants are able to choose their roommates when sharing a room or unit. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 3	Leases are the same for participants as for other tenants	Leases do not have any provisions that would not be found in leases held by any other tenant in the property or building and is renewable per the participants’ and owner’s choice. People experiencing homelessness who receive help moving into permanent housing should have leases that confer the full rights, responsibilities, and legal protections under Federal, state, and local housing laws. For transitional housing, there may be limitations on length of stay, but a lease/occupancy agreement should look like a lease that a person would have in the normal rental market. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 4	Participants receive education about their lease or occupancy agreement terms	Participants are also given access to legal assistance and encouraged to exercise their full legal rights and responsibilities. Landlords and providers abide by their legally-defined roles and responsibilities. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Leases 5	Measures are used to prevent eviction	Property or building management, with services support, incorporates a culture of eviction avoidance, reinforced through practices and policies that prevent lease violations and evictions among participants, and evict participants only when they are a threat to self or others. Clear eviction appeal processes and due process is provided for all participants. Lease bifurcation is allowed so that a tenant or lawful occupant who is a victim of a criminal act of physical violence committed against them by another tenant or lawful occupant is not evicted, removed or penalized if the other is evicted.	Please select answer	Please select answer	Please select answer

Optional notes here					
Leases 6	Providing stable housing is a priority	Providers engage in a continued effort to hold housing for participants, even if they leave their housing for short periods due to treatment, illness, or any other temporary stay outside of the unit.	Please select answer	Please select answer	Please select answer
Optional notes here					
Leases 7	Rent payment policies respond to tenants' needs (as applicable)	While tenants are accountable to the rental agreement, adjustments may be needed on a case by case basis. As necessary, participants are given special payment arrangements for rent arrears and/or assistance with financial management, including representative payee arrangements.	Please select answer	Please select answer	Please select answer
Optional notes here					



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

Standard		Services Definition / Evidence	Say it	Document it	Do it
Services 1	Projects promote participant choice in services	Participants are able to choose from an array of services. Services offered are housing focused and include the following areas of support: employment and income, childhood and education, community connection, and stabilization to maintain housing. These should be provided by linking to community-based services.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 2	Person Centered Planning is a guiding principle of the service planning process	Person-centered Planning is a guiding principle of the service planning process	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 3	Service support is as permanent as the housing	Service connections are permanently available and accessible for participants in Permanent Supportive Housing. Rapid Re-Housing projects should, at a minimum, be prepared to offer services for up to 6 months after the rental assistance ends. In emergency shelter and transitional housing, services are available as long as the participant resides in the unit or bed – and up to 6 months following exit from transitional housing.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 4	Services are continued despite change in housing status or placement	Wherever possible, participants continue to be offered services even if they lose their housing unit or bed (for congregate projects), or if they are placed in a short-term inpatient treatment. Ideally, the service relationship should continue, despite a service hiatus during some institutional stays.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Services 5	Participant engagement is a core component of service delivery	Staff provide effective services by developing relationships with participants that provide immediate needs and safety, develop trust and common ground, making warm hand-offs to other mainstream service providers, and clearly explain staff roles. Engagement is regular and relationships are developed over time.	Please select answer	Please select answer	Please select answer

Optional notes here					
Services 6	Services are culturally appropriate with translation services available, as needed	Project staff are sensitive to and support the cultural aspects of diverse households. Wherever possible, staff demographics reflect the participant population they serve in order to provide appropriate, culturally-specific services. Translation services are provided when needed to ensure full comprehension of the project. Projects that serve families with children should have family-friendly rules that allow for different schedules based on work and school hours and have services that allow parents to participate in activities without having to constantly supervise their children themselves (i.e. can use the bathroom or take a shower without their children being in the bathroom with them).	Please select answer	Please select answer	Please select answer
Optional notes here					
Services 7	Staff are trained in clinical and non-clinical strategies (including harm reduction, motivational interviewing, trauma-informed approaches, strength-based)	Services support a participant’s ability to obtain and retain housing regardless of changes in behavior. Services are informed by a harm-reduction philosophy, such as recognizing that substance use and addiction are a part of some participants’ lives. Participants are engaged in non-judgmental communication regarding their behavior and are offered education regarding how to avoid risky behaviors and engage in safer practices.	Please select answer	Please select answer	Please select answer
Optional notes here					
Standard		Housing Definition / Evidence	Say It	Document It	Do It
Housing 1	Housing is not dependent on participation in services	Participation in permanent and temporary housing settings, as well as crisis settings such as emergency shelter, is not contingent on participating in supportive services or demonstration of progress made on a service plan. Services must be offered by staff, but are voluntary for participants.	Please select answer	Please select answer	Please select answer
Optional notes here					
Housing 2	Substance use is not a reason for termination	Participants are only terminated from the project for violations in the lease or occupancy agreements, as applicable. Occupancy agreements or an addendum to the lease do not include conditions around substance use or participation in services. If the project is a recovery housing model focused on people who are in early recovery from drugs or alcohol (as outlined in HUD’s Recovery Housing Brief), different standards related to use and subsequent offer of treatment may apply. See HUD’s Recovery Housing brief here: https://www.hudexchange.info/resource/4852/recovery-housing-policy-brief/	Please select answer	Please select answer	Please select answer
Optional notes here					
Housing 3	The rules and regulations of the project are centered on participants’ rights	Project staff have realistic expectations and policies. Rules and regulations are designed to support safe and stable communities and should never interfere with a life in the community. Participants have access to the project at all hours (except for nightly in and out shelter) and accommodation is made for pets.	Please select answer	Please select answer	Please select answer

Optional notes here					
Housing 4	Participants have the option to transfer to another project	Transfers should be accommodated for tenants who reasonably believe that they are threatened with imminent harm from further violence if the tenant remains in the same unit. Whenever possible, transfers occur before a participant experiences homelessness.	Please select answer	Please select answer	Please select answer
Optional notes here					



Housing First Standards

For each standard, please use the drop down boxes in the three columns to the right to select “Not at all” or “Sometimes” or “Always”. Marking “Always” signifies full compliance for the standard.

	Standard	Project -Specific Standards	Say It	Document it	Do it
Project 1	Quick access to RRH assistance	A Rapid Re-housing project ensures quick linkage to rapid re-housing assistance, based on participant choice. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Project 2	RRH services support people in maintaining their housing	Participants and staff understand that a primary goal of rapid re-housing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of perceived barriers. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
Project 3	Providers continuously assess a participant’s need for assistance	On an ongoing basis, providers assess a participant’s needs for continued assistance and provide tailored assistance based on those assessments. <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
		No additional standards <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer
		No additional standards <i>Optional notes here</i>	Please select answer	Please select answer	Please select answer

No additional standards					
Optional notes here					
No additional standards					
Optional notes here					
No additional standards					
Optional notes here					
Standard		Population Specific Standards	Say It	Document It	Do It
Population 1	Recovery housing is offered as one choice among other housing opportunities	Connection to recovery housing reflects individual choice for this path toward recovery. Abstinence-only spaces are incorporated into a Housing First model wherever possible, thus providing this type of recovery option to those who choose it. Recovery supports are offered, particularly connections to community-based treatment options.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Population 2	Services include relapse support	Housing and services include relapse support that does not automatically evict or discharge a participant from the project for temporary relapse. Relapse support might include referrals to outpatient treatment or direct provision of outpatient services or the ability to hold a unit for a certain period of time (30-90 days) while the participant undergoes residential treatment.	Please select answer	Please select answer	Please select answer
		Optional notes here			
Population 3	Services support sustained recovery	Recovery housing projects provide services that align with participants' choice and prioritization of recovery, including but not limited to abstinence from substances (if that is a personal goal), long-term permanent housing stability, and stable income through employment or benefits. Support is offered through connections to community-based treatment options.	Please select answer	Please select answer	Please select answer

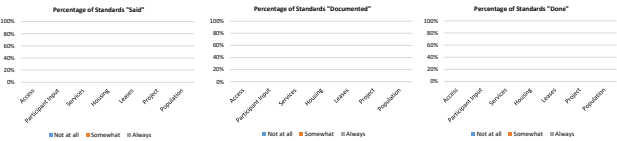
Optional notes here	
Population	No additional standards
Optional notes here	



Some standards have not been evaluated. Please return and complete all standards before finalising report.

Your score: 0
Max potential score: 238

Score is calculated by awarding 1 point for standards answered 'sometimes' and 2 points for standards answered 'always'. Categories that are not applicable for your project are not included in the maximum potential score.



Non-Compliant Standards ("Not at All" to Whether Standard is Satisf)				Non-Documented Standards ("Not at All" to Whether Standard is Documented)				Non-Existent Standards ("Not at All" to Whether Standard is Done")			
Category	No.	Name	Standard	Category	No.	Name	Standard	Category	No.	Name	Standard

Example	Document	Findings	N	Name	Standard	Category	Notes	Not at all	Not at all	Not at all	Order of columns: Non-compliant (C-9) Non-compliant (J-1) Non-compliant (J-2)
Phase select answer	Phase select answer	Phase select answer	1	Proprietary low barrier	Substance to projects is not contingent on pre-requisites such as abstinence of substances, minimum income requirements, health or mental health history, medication adherence, age, criminal past, etc.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Proprietary do not deny assistance for necessary reasons	Procedures and oversight demonstrate that staff do everything possible to avoid denying assistance or rejecting an individual or family for the reasons listed in Access Standard #1.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Access regardless of sexual orientation, gender identity, etc.	A rapid access is provided in accordance with the 2012 and 2016 Equal Access Rules, meaning that no project funded by HRID must create equal access for persons regardless of one's sexual orientation.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Admission process is expedited with speed and efficiency	Projects have expedited admission processes, to the greatest extent possible, including helping participants obtain documentation required by funding sources, as well as processes to admit participants.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	Intake processes are person-centered and flexible	Intake and assessment procedures are focused on the individual's or family's strengths, needs, and preferences. Projects do not require specific appointment times, but have flexible intake schedules.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	The provider/project accepts and makes referrals directly	Providers/project accept participants in the CoC-designated Coordinated Entry process as part of its standard community-wide system access and intake. If these processes are not yet implemented, projects	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	Entry to households are avoided	Projects that are no longer serve particular households unless the coordinated entry process, or the community's existing related process of coordinated entry processes are not yet implemented.	Access	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Participant education is ongoing	Project participants receive ongoing education on Housing First principles as well as other services made available in the project. In the beginning of and throughout tenancy, participants are informed.	Participant In	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Proprietary create regular, formal opportunities for participation	Input is solicited regarding the project's policies, processes, procedures, and practices. Opportunities include involvement in quality assurance and evaluation processes, a participant leadership ad	Participant In	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Participant choice in services	Participants are able to choose from an array of services. Services offered are housing focused and include the following areas of support: employment and income, childhood and education, communit	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Person-Centered Planning is a guiding principle of the service	Person-centered Planning is a guiding principle of the service planning process.	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Service support is as continued in the housing	Service connections are permanently available and accessible for participants in Permanent Supportive Housing. Rapid Re-Housing projects should, at a minimum, be prepared to offer services for up	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Services are maintained despite change in housing status or if	Wherever possible, participants continue to be offered services even if they lose their housing unit or fail (for co-occurring projects), or if they are placed in a short-term supportive treatment. Ideally, the	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	Participant engagement is a core component of service deliv	Staff provide effective services by developing relationships with participants that provide immediate needs and safety, develop trust and common ground, making warm hand-offs to other maintain	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	Services are culturally appropriate with translation services	Projects staff are sensitive to and support the cultural aspects of diverse households. Wherever possible, staff demographics reflect the participant population they serve in order to provide appropriate	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	Staff are trained in clinical and non-clinical strategies (inclu	Services support a participant's ability to obtain and retain housing regardless of changes in behavior. Services are informed by a harm reduction philosophy, such as recognizing that substance use and	Services	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Housing is not dependent on participation in services	Participation in permanent and temporary housing settings, as well as other settings such as emergency shelter, is not contingent on participating in supportive services or demonstration of progress or	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Substance use is not a reason for termination	Participant are only terminated from the project for violations in the lease or occupancy agreements, as applicable. Occupancy agreements or an addendum to the lease do not include conditions on	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	The rules and regulations of the project are centered on p	Optional notes here	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Participants have the option to transfer to another projec	Transfer should be accommodated for tenants who reasonably believe that they are threatened with imminent harm from further violence if the tenant remains in the same unit. Wherever possible, the	Housing	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Housing is considered permanent (not applicable for Trans	Housing is not time-limited (though rent assistance may be) and leases are automatically renewable upon expiration, except with prior notice by either party.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Participant choice is fundamental	A participant has, at minimum, choices in deciding the location and type of housing based on preferences from a range of housing types and among multiple units, as available and as practical. In partic	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Leases are the same for participants as for other tenants	Leases do not have any provisions that would not be found in leases held by any other tenant in the property or building and to ensure this part the participants' and owner's choice. People experiencing	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	Participants receive education about their lease or occupan	Participants are also given access to legal assistance and encouraged to exercise their full legal rights and responsibilities. Landlords and providers abide by their legally-defined roles and responsibilities.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	Measures are used to prevent evictions	Property or building management, with services support, incorporates a culture of eviction avoidance, mediated through practices and policies that prevent lease violations and evictions among partic	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	Providing stable housing is a priority	Optional notes here	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	First permanent policies respond to tenants' needs (or appli	While tenants are accountable to the rental agreement, adjustments may be needed on a case-by-case basis. As necessary, participants are given special permanent arrangements for rent arrears and/or a	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Quick access to RRI assistance	A Rapid Re-housing project creates quick linkage to rapid re-housing assistance, based on participant choice.	Leases	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	RRI services support people in maintaining their housing	Participants and staff understand that a primary goal of rapid re-housing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of persistence of barriers.	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Providers continuously assess a participant's need for assist	On an ongoing basis, providers assess a participant's needs for continued assistance and provide tailored assistance based on those assessments.	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	No additional standards	Optional notes here	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	No additional standards	Optional notes here	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	6	No additional standards	Optional notes here	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	7	No additional standards	Optional notes here	Project speed	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	1	Recovery housing is offered as one choice among other ho	Connections to recovery housing reflects individual choice for the path toward recovery. Abstinence-only spaces are incorporated into a Housing First model wherever possible, thus providing the type	Population	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	2	Services include relapse support	Housing and services include relapse support that does not automatically evict or discharge a participant from the project for temporary relapse. Relapse support might include referrals to outpatient	Population	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	3	Services support sustained recovery	Recovery housing projects provide services that align with participants' choice and prioritization of recovery, including but not limited to abstinence from substances if that is a personal goal, long	Population	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	4	No additional standards	Optional notes here	Population	Optional notes here	0			
Phase select answer	Phase select answer	Phase select answer	5	No additional standards	Optional notes here	Population	Optional notes here	0			



This page does not comprise part of the assessment. It is for information only.

Numbers	Access			Participant Input			Services			Housing			Leases			Project-specific			Population		
	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always
Please select answer	21			6			21			12			21			9			9		
Say it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Document it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Do it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Checks	-			-			-			-			-			-			-		

Percentages	Access			Participant Input			Services			Housing			Leases			Project-specific			Population		
	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always
Please select answer	300%			300%			300%			300%			300%			300%			300%		
Say it	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Document it	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Do it	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Number of standards	7			2			7			4			7			3			3		

'Say It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	0%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	0%	0%	0%	0%	0%	0%	0%
Check	-						

'Document It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	0%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	0%	0%	0%	0%	0%	0%	0%
Check	-						

'Do It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	0%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	0%	0%	0%	0%	0%	0%	0%
Check	-						

Supportive Housing Standards Rating		Pointer
Start	0	Value
Initial	15	Pointer
Middle	45	End
End	40	198
Max	100	

Score: 0

Standard Numbers	With special pop	Without special pop
Coordinated entry	15	12
Street outreach	15	12
Emergency shelter	26	23
Transitional housing	33	30
Rapid rehousing	33	30
Permanent supportive housing	33	30

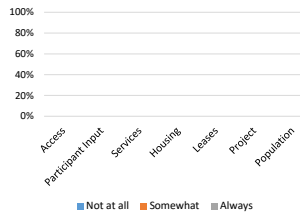
Max answer score (for 'always') 6 3 categories (say, document, do) x 2 max points for 'always'

Answer Numbers	With special pop	Without special pop
Coordinated entry	90	72
Street outreach	90	72
Emergency shelter	156	138
Transitional housing	198	180
Rapid rehousing	198	180
Permanent supportive housing	198	180

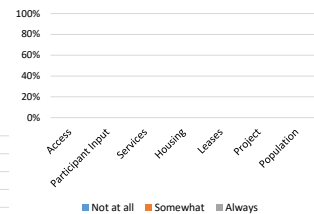
Project type	Rapid Rehousing	3
Special population	People in Recovery	1

Evaluation max score 198

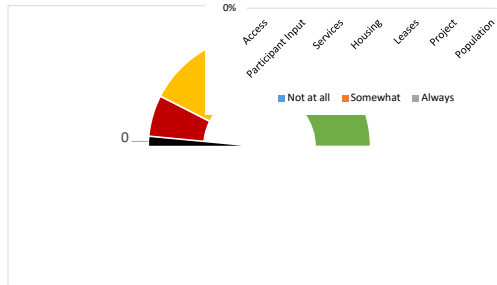
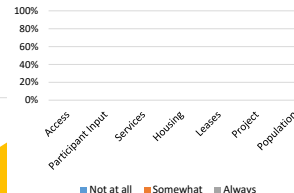
"Say It" Standards, by Category and Response



"Do It" Standards, by Category and Response



"Document It" Standards, by Category and Response





Assumptions for the standards

This page does not comprise part of the assessment. It is for information only.

Project standards

Standards	Coordinated Entry	Street Outreach	Emergency Shelter	Transitional Housing	Rapid Rehousing	Permanent Supportive Housing	Joint Transitional Housing & Rapid Rehousing
Title	Coordinated Entry does not screen people out for perceived barriers	Projects screen for health and safety needs	Focus of emergency shelter is on safe and responsive temporary shelter	Quick access to TH assistance	Quick access to RRH assistance	Quick access to PSH assistance	Quick access to RRH assistance
Project 1	Coordinated Entry does not screen people out for assistance due to perceived barriers related to housing or services, including, but not limited to, too little or no income, active or a history of substance use, domestic violence history, minimal linkage to other services, the type or extent of disability-related services or supports that are needed, or criminal justice history.	Outreach projects screen people contacted through outreach as soon as possible for critical health and safety needs, providing immediate response to people with the most severe needs.	Participants and staff understand that the primary goal of the emergency shelter are to provide temporary accommodation that is safe, respectful, and responsive to individual needs and that participants are offered permanent housing as quickly as possible, regardless of perceived barriers.	A transitional housing project ensures quick linkage to a unit and services based on participant choice.	A Rapid Rehousing project ensures quick linkage to rapid rehousing assistance, based on participant choice.	A permanent supportive housing project ensures quick linkage to a unit and wrap-around services, based on participant needs, preferences, and resource availability.	A Rapid Rehousing project ensures quick linkage to rapid rehousing assistance, based on participant choice.
	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required
Title	Process to assess project-level policies and alert CoC	Street outreach projects are focused on providing access to housing and services	Housing comes first	Transitional housing is focused on safe and quick transitions to permanent housing	RRH services support people in maintaining their housing	PSH is focused on ending homelessness for those with the most severe barriers to maintaining housing	RRH services support people in maintaining their housing
Project 2	Written policies and procedures exist to determine which projects have project-level policies that screen out "high barrier" households, and the steps that the coordinated entry provider will take to alert the CoC of these projects, thereby enabling the CoC to take steps to assist these projects in adopting Housing First principles.	Participants and staff understand that the primary goal of street outreach are to provide access to temporary housing and services and/or re-housing participants as permanent housing as quickly as possible, regardless of perceived barriers. Street outreach project first enter an emergency shelter if the low-barrier orientation of the Coordinated Entry process.	If a temporary shelter placement is made, assessment and planning for permanent housing placement begins as quickly as possible. People who are unsheltered are not required to first enter an emergency shelter in order to access permanent housing placement assistance and enter permanent housing.	Participants and staff understand that the primary goal of transitional housing are to provide temporary accommodations that are safe, respectful, and responsive to individual needs, address the service needs of participants, and re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns, and as desired by the participant. Participation in transitional housing services does not inhibit participants from moving to permanent housing when they choose to. Assessment and planning for permanent housing placement begins as soon as the individual or family expresses a desire to transition to permanent housing.	Participants and staff understand that a primary goal of rapid rehousing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of perceived barriers.	Participants and staff understand that a primary goal of permanent supportive housing is to end homelessness for people with the most severe service needs and help participants stay housed, regardless of other perceived barriers.	Participants and staff understand that a primary goal of rapid rehousing is to end homelessness and move participants to permanent housing as quickly as possible, regardless of perceived barriers.
	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required
Title	RRH as a bridge to permanent supportive housing	Coordinated Entry is linked to Street Outreach	TH projects provide appropriate services	Providers continuously assess a participant's need for assistance	Property Management duties are separate and distinct from services/case management	Providers continuously assess a participant's need for assistance	
Project 3	Rapid Re-Housing is made available to serve as a bridge to other permanent housing options so that persons with high service needs or vulnerabilities can be housed more quickly. (See HUD's Rapid Re-Housing Brief here: https://www.hudexchange.info/resources/documents/Rapid-Re-Housing-Brief.pdf)	Written policy and procedures detail a process by which street outreach staff ensure that persons encountered on the streets are offered the same standardized processes as persons assessed through site-based assessment. Outreach teams are coordinated, trained, and have the ability to engage and quickly connect people experiencing homelessness to the local coordinated entry process in order to apply for and obtain permanent housing. Based on the CoC's decision about how street outreach is incorporated into the assessment process, street outreach projects must comply with the CoC's decision.	No additional standards	TH projects provide appropriate services to meet the participants health and safety needs (e.g., persons in early recovery domestic violence survivors, those who need special accommodations) when there are no permanent housing solutions available (with or without supportive services) or when the participant chooses transitional housing. Services are not required in order to participate in housing.	In order to provide clear roles of staff for participants in terms of lease and rules enforcement as well as tenant advocacy, property management and service provider staff should be separate roles. However, they should work together on a regular basis through regular communication and meetings regarding Participants to address tenancy issues in order to preserve tenancy.	On an ongoing basis, providers assess a participant's needs for continued assistance and provide tailored assistance based on these assessments.	On an ongoing basis, providers assess a participant's needs for continued assistance and provide tailored assistance based on these assessments.
	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required	Type notes here, if required
Title		Street outreach continuously engages those experiencing homelessness and on the street	Housing comes first	Transitional housing is focused on safe and quick transitions to permanent housing	Participants and staff understand that the primary goal of transitional housing are to provide temporary accommodations that are safe, respectful, and responsive to individual needs, address the service needs of participants, and re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns, and as desired by the participant. Participation in transitional housing services does not inhibit participants from moving to permanent housing when they choose to. Assessment and planning for permanent housing placement begins as soon as the individual or family expresses a desire to transition to permanent housing.		
Project 4	No additional standards	Through continuous engagement strategies, a street outreach project provides quick linkage to housing and services when a person is ready to engage.	No additional standards	No individuals or families, including those who are unsheltered, are required to enter a transitional housing project in order to access permanent housing placement assistance and enter permanent housing.	No additional standards	No additional standards	
		Type notes here, if required		Type notes here, if required		Type notes here, if required	
Title		Street Outreach engagements inform the community's efforts to improve their crisis response system				TH projects provide appropriate services	
Project 5	No additional standards	Communities use street outreach engagements with those on the street and to encourage them to understand and remove barriers to those accessing the crisis response system.	No additional standards	No additional standards	No additional standards	No additional standards	TH projects provide appropriate services to meet the participants health and safety needs (e.g., persons in early recovery domestic violence survivors, those who need special accommodations) when there are no permanent housing solutions available (with or without supportive services) or when the participant chooses transitional housing. Services are not required in order to participate in housing.
		Type notes here, if required					Type notes here, if required
Title							
Project 6	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards
Title							
Project 7	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards	No additional standards

Project standards

Standards	Youth and Young Adults	People in Recovery	Domestic Violence Survivors	None of the above
Title	Services are offered	Recovery housing is offered as one choice among other housing opportunities	Participant safety is a priority at all points of engagement and in all planning processes	
Population 1	Services are focused on ensuring that youth transition to independence.	Connection to recovery housing reflects individual choice for this path toward recovery. Distraction-only spaces are incorporated into a Housing First model wherever possible, thus providing this type of recovery option to those who choose it. Recovery supports are offered, particularly connections to community-based treatment options.	Lead by the survivor, a safety plan is developed that includes an assessment of danger, particular points of vulnerability, and best approaches to increasing safety.	
	Type notes here, if required	Type notes here, if required	Type notes here, if required	
Title	Projects include positive youth development principles	Services include relapse support	Survivor-driven advocacy is available	
Population 2	Youth projects should include positive youth development orientation. Positive youth development builds on strengths and resilience. By focusing on strengths and assets, rather than what might be "wrong," youth are empowered and are equipped to make positive decisions.	Housing and services include relapse support that does not automatically exist or discharge a participant from the project for temporary relapse. Relapse support might include referrals to outpatient treatment or direct provision of outpatient services or the ability to hold a unit for a certain period of time (30-90 days) while the participant undergoes residential treatment.	The unique needs and strengths of each individual survivor and their children are taken into account with regard to the types of services that are available and offered. Project uses flexible and survivor-focused approaches to overcome barriers survivors may face in accessing services through traditional models.	
	Type notes here, if required	Type notes here, if required	Type notes here, if required	
Title	Staff use harm reduction practices and approaches	Services support sustained recovery	Housing stability is a priority	
Population 3	Youth models employ a harm reduction and recovery orientation, including those developed for youth and young adults with substance use and addictions. Projects may make substance-based models available for youth and young adults; however, the choice should be with the participant, not with the project.	Recovery housing projects provide services that align with participants' choice and prioritization of recovery, including but not limited to: abstinence from substances (if that is a personal goal), long-term permanent housing, stability, and stable income through employment or benefits. Support is offered through connections to community-based treatment options.	Providers support survivors and their children to retain or obtain safe, stable housing. Survivors choose the type of housing and location of housing. Housing is located in an area that is considered safe from the abusive relationships.	
	Type notes here, if required	Type notes here, if required	Type notes here, if required	
Title	Project design accounts for the age of youth and young adults to be served			
Population 4	Developmentally appropriate project design ensures that project entry and on-going participation is not predicated on behaviors or experiences that youth and young adults may not currently have or if they were older would not result in consequences. For example, projects should accept and allow continued participation for youth who do not have income or immediate prospects of income because their age has not allowed them the opportunity to gain employment.	No additional standards	No additional standards	
	Type notes here, if required			

1E-2a. Scored Forms for One Project

COVER

ICS Scorecard – All Projects – See Raymond’s Refuge PSH

ICS – Furthering Equity Commitment Review

Furthering Equity Report

Furthering Equity Example

ICS – Housing First Tools

HUD HF Self-Assessment

COC Housing First Checklist Form

ICS – Monitoring Report

RATING AND RANKING GENERAL DESCRIPTION

<i>Item</i>	<i>Documentation</i>
The U.S. Department of Housing and Urban Development (HUD) requires local Continuum of Care (CoC) areas to review and rank-order applications to be submitted to HUD under the annual CoC Competitive Notice of Funding Opportunity (NOFO).	NOFO
1. The first step in the Rating and Ranking Process, is to confirm that the Applicant organization and the Proposed Project meet the threshold requirements set by HUD and the local CoC.	Threshold Review - see source documents in Tracking List
2. The project ranking order is developed from a variety of factors such as the project raw score from the application scorecard (generated by HMIS and R&R), HUD and local priorities, and compliance with local and HUD quality project review guidelines. The process relies heavily on objective data, demonstrated capacity, measured performance, and alignment with local priorities . Data from HMIS and the Comparable DV Data base are used in the process.	Rating sheets; APR Housing First Review sheet; Audit, etc
3. Basic strategies and protocols for rank-ordering projects within the two tiers required by HUD are summarized in a separate notice Ranking Strategies and Protocols that supplements this document and is posted on the RTFHSD.org website.	Ranking Strategies Protocols
4. Maximizing Use of Funds: After initial scoring of projects; the CoC Rating and Ranking Committee review the rank order to ensure that protocols are followed: resolving ties; ensuring maximum use of funds; strategic consideration of the use of Tiering and any project straddling the two tiers, addressing system needs and benefit to the CoC . For example: ties are resolved by benefit to CoC using project type; number of units offered; length of project in CoC system, geographic location, and Board priorities. The Rating and Ranking process establishes the rank order of the projects in the priority listing.	Rating and Ranking protocols; Board action; Strategic Plan
5. The CoC Reallocation Protocols are found in a separate document that outlines the content, steps, and criteria for Reallocation of part or all of the funds for an eligible renewal project. To ensure maximum use of funds, the history of expenditures and level of unspent funds are components of the Reallocation Protocols that helps to establish the level of funding allocated to the Project. Also see Performance Improvement and Chronic Underspending Reallocation Policy.	Reallocation Protocols, Including general process, Performance Improvement, and Chronic Underspending Reallocation
6. Required System Projects (HMIS, CES) are placed in Tier 1 by Board directive.	Board Directive
7. In FY 24 There is an additional section of questions for applicants requesting DV Bonus funds. The projects are scored on the base points, then the DV bonus order is adjusted by the points in the special question section.	DV Question Response
8. In FY 24 The unranked CoC Planning Grant and YHDP Grants are listed below Tier 2.	HUD Directive
9. Per HUD Guidance, in FY 24 YHDP Renewal Projects and Replacement Projects are reviewed but not ranked. These are listed immediately above the unranked CoC Planning Grant	HUD Directive
10. HUD regulations in 24 CFR part 578.7(a) 6 require the CoC to "take action against poor performers". To that end, the CoC Board authorized a Performance Improvement Plan (PIP) requirement that is incorporated into the Rating and Ranking process. If an Applicant fails to meet the PIP requirements for any project, the project is subject to reallocation.	PIP Listed on Scoring, R&R Review of PIP Performance Evidence
11. Although not required by HUD, local process includes opportunity for Appeal. Please refer to the Notice of Appeal posted on the RFTHSD.org website	Appeal Notice and Decision

RENEWAL THRESHOLD REQUIREMENTS

Project Name: Projects must meet these criteria which are separate from the numeric scoring.

Organization Name: ICS

Project Type: RENEWALS

Project Identifier:

REVIEW TEAM NUMBER only ID:

TA

Renewal Projects Threshold Review Complete0%

THRESHOLD REQUIREMENTS	YES/NO
------------------------	--------

Stakeholders should NOT assume all requirements are fully addressed through this tool. CoC Program application requirements change periodically and annual NOFAs may provide more detailed guidance. The CoC collaborative applicant and project applicants should carefully review the annual NOFA criteria each year.

Y

HUD THRESHOLD REQUIREMENTS

1. Applicant has Active SAM registration that is valid til January 2025.	Yes
2. Applicant has Valid Entity Unique Identifier (UEI) number in application. (Submitted Evidence)	Yes
3. Applicant has no Outstanding Delinquent Federal Debts- It is HUD policy, that applicants with outstanding delinquent federal debt will not be eligible to receive an award of funds, unless they have a repayment schedule and they are not delinquent, or otherwise have evienc of approval by HUD.	Yes
4. Applicant has no Debarments and/or Suspensions - No award of federal funds may be made to debarred or suspended applicants, or those proposed to be debarred or suspended from doing business with the Federal Government.	Yes
5. Applicant has Accounting System - HUD will not award or disburse funds to applicants that do not have a financial management system that meets federal standards as described at 2 CFR 200.302. HUD may arrange for a survey of financial management systems for applicants selected for award who have not previously received federal financial assistance or where HUD Program officials have reason to question whether a financial management system meets federal standards, or for applicants considered high risk based on past performance or financial management findings. (Submitted Audit. Provide Local review description)	Yes
6. Disclosed any violations of Federal criminal law - Applicants must disclose in a timely manner, in writing to HUD, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in 2 CFR §200.338, Remedies for noncompliance, including suspension or debarment. This mandatory disclosure requirement also applies to subrecipients of HUD funds who must disclose to the pass-through entity from which it receives HUD funds.	Yes
7. Demonstrated they are Eligible Project Applicants - Eligible project applicants for the CoC Program Competition are,under 24 CFR 578.15, nonprofit organizations, States, local governments, and instrumentalities of State and local governments. Public housing agencies, as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion. Neither for-profit entities nor Indian tribes are eligible to apply for grants or to be subrecipients of grant funds.	Yes
8. Submitted the required certifications as specified in the NOFO and Local INTENT to SUBMIT.	Yes
9. Demonstrated the project is cost-effective, including costs of construction, operations, and supportive services with such costs not deviating substantially from the norm in that locale for the type of structure or kind of activity.	Yes
10. Demonstrated they Participate in HMIS - Project applicants, except Collaborative Applicants that only receive awards for CoC planning costs and, if applicable, UFA Costs, must agree to participate in a local HMIS system. However, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use a comparable database that complies with the federal HMIS data and technical standards. While not prohibited from using HMIS, legal services providers may use a comparable database that complies with federal HMIS data and technical standards, if deemed necessary to protect attorney client privilege.	Yes

11. Demonstrated Project Meets Minimum Project Standards - HUD will assess all new projects for the following minimum project eligibility, capacity, timeliness, and performance standards. Please note that these are minimum threshold criteria. CoCs and project applicants should carefully review each the NOFO and the local Threshold Handout and the Documents Needed List to account for additional standards. To be considered as meeting project quality threshold, all new projects must meet all of the following criteria:
- (a) Project applicants and potential subrecipients must have **satisfactory capacity, drawdowns, and performance for existing grant(s) that are funded** under the SHP, S+C, or CoC Program, as evidenced by timely reimbursement of subrecipients, **regular drawdowns, and timely resolution of any monitoring findings**;

(b) **For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources; and,**

(c) Project applicants must demonstrate they will be able to meet all timeliness standards. Project applicants with existing projects must demonstrate that they have met all project renewal threshold requirements of this NOFA. HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, unresolved audit or monitoring finding related to one or more existing grants, or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant. *(Note: Project contracts must be signed on or before December 31, of the renewal year.*
12. Demonstrated Project is Consistent with Jurisdictional Consolidated Plan(s) - All projects must be consistent with the relevant jurisdictional Consolidated Plan(s). *(Note: These certificates are gathered by RTFH Technical Assistance prior to submittal of the application.)*
13. Meets HUD thresholds in the CoC NOFO: History of inadequate financial practices; indications of mismanagement; drastic reduction in population served; made project changes without HUD prior approval; or lost a project site.

Yes

Yes

Yes

Yes

CoC THRESHOLD REQUIREMENTS

For each requirement, select “Yes” if the project has provided reasonable assurances that the project will meet the requirement, or has been given an exception by the CoC or has requested a Waiver from HUD. Otherwise select “No”.

Coordinated Entry Participation

Yes

Housing First and/or Low Barrier Implementation

Yes

Documented, secured minimum match

Yes

Project is financially feasible

Yes

Applicant commits to CoC participation.

Yes

Application is complete and data are consistent

Yes

Acceptable organizational audit/financial review

Yes

Documented organizational financial stability

Yes

Demonstrated Site Control is strongly advised.

New Projects Submit General Certification

PSH RENEWAL RATING TOOL 2024

Agency

Project

Project Type

Project Identifier

Interfaith Community Services

Raymond's Refuge

PSH Renewal

Team Reviewer

Review complete

yes

Category	Criteria	Project Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (less than 50%)	Data Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	PSH	0	Y	Yes			CoC Monitoring - Documentation, etc.	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	PSH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	PSH	0	Y	Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	PSH	0	Y	Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	PSH	0	Y	Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	PSH	0	Y	Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	PSH	0	Y	Yes			Threshold Review Page & Sources	0	0	0
Exit to Permanent Housing	Minimum percent remain in or move to permanent housing	PSH	25	12.5	>= 91%	45.5% - 90%	< 45.5%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project # of days	PSH	5	2.5	>= 1090 days	545-1089 days	< 545 days	APR Q	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	PSH	2	0	>=8%	4-7.99%	< 4%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	PSH	2	0	>=11%	5.5% - 10.9%	< 5.5%	APR Q	2	1	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	PSH	3	3	>=41%	20.5% - 40.9%	<20.5	APR Q	3	1.5	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	PSH	3	3	>=55%	27.5% - 54.5%	< 27.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	PSH	5	5	>=90%	80-89%	<80%	Housing First Scoring Tool completed & % of total p	5	3	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	PSH	5	5	0 Issues	2 issues / corrected	substantial deficiency risk	Audit/ Monitoring Review Form	5	3	0
Project Effectiveness	CoC Review - management; documentation	PSH	4	2	0 Issues	1-2 Issues	more than 2 Issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	PSH	6	6	>= 95%	>=90-94%	< 90%	F-LOCES report; use of funds; grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	PSH	12	12	<= 5 % (no more than 5% above benchmark)	<=7% No more than 7% above benchmark)	>7.% or more above benchmark	Full points= Not more than 5% above average cost per successful exit (Project Budget; APR ; and Cost Chart)	12	6	0
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ Exit	PSH	15	0	<=7%	>7 -10.5%	>10.5%	HMIS Report	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	PSH	5	5	>=39%	19% - 38%	< 19%	APR calculation	5	2.5	0
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	PSH	5	5	>=55%	27.5% - 54.9%	< 27.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	PSH	5	2.5	>=36%	18% - 35.9%	< 18%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	PSH	1	0	100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	PSH	1	0.5	= 100%	>=50%	50	APR Q served	1	0.5	0
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/youth	PSH	1	1	>50%	50%	<50%	Application & APR served	1	0	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender, disability)	PSH	5	5	= 5	Up to 1 point per item - scoring review	< 1	Furthering Equity Report Review form up to 1 point per action item met.	5	per scoring review	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	PSH	5	0	Yes >= 25% Leverage	Yes < 25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence).	PSH	5	0	27% and Above	25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0

PIP PLAN BENCHMARK Points

Possible Points	120	70
	66	

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

If Yes, PIP required before submittal to HUD

Was Project under PIP in 2023?

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

If the Project was under PIP in both 2022 and 2023, review for Reallocation

no

no

2024 Benchmark Base: Fam = 6437; IND = 11691; Mixed = 13,194

PSH RENEWAL RATING TOOL 2024

Agency

Project

Project Type

Project Identifier

InterFaith Community Services

Home Now

RRH Renewal

Team Reviewer

Review complete

yes

Category	Criteria	Project Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (less than 50%)	Data Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	RRH	0	Y	Yes			CoC Monitoring - Documentation, etc.	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	RRH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	RRH	0	Y	Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	RRH	0	Y	Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	RRH	0	Y	Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	RRH	0	Y	Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	RRH	0	Y	Yes			Threshold Review Page & Sources APR calculation	0	0	0
Exits to Permanent Housing	Minimum percent remain in or move to permanent housing	RRH	25	12.5	>=57%	28.5% - 56%	< 28.5%		25	12.5	0
Length of Stay	On average, participant who left stayed in project ## days	RRH	5	5	< 362 days	363 - 541 days	>=541	APR Q	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	RRH	2	2	>=21%	10.5% - 20%	< 10.5%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	RRH	2	2	>=30%	15% - 29%	< 15%	APR Q	2	1	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	RRH	3	3	>=19%	9.5% -18%	< 9.5%	APR Q	3	1.5	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	RRH	3	1.5	>=31%	15.5% - 30%	< 15.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	RRH	5	5	>=90%	80%- 89%	<80%	Housing First Scoring Tool completed & % of total p	5	3	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	RRH	5	5	0 Issues	2 issues / corrected	more than 2 or substantial deficiency risk	Audit/ Monitoring Review Form	5	3	0
Project Effectiveness	CoC Review - management; documentation	RRH	4	4	0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	RRH	6	0	>= 95%	>=90%- 94%	< 90%	F-LOCES report; use of funds; grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	RRH	12	12	<= 5 % above	<=7% above	More than 7% above	Full points= Not more than 5% above average cost per successful exit (Project Budget; APR ; and Cost Chart)	12	6	0
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ Exit	RRH	15	0	<=15%	>15%- 22%	> 22%	HMIS Report	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	RRH	5	5	>=58%	29% - 57%	< 29%	APR calculation	5	2.5	0
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	RRH	5	2.5	>=25%	12.5% - 24%	< 12.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	RRH	5	2.5	>=34%	17% - 33%	< 17%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	RRH	1	0	100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	RRH	1	0.5	100%	50% +	<50%	APR Q served	1	0.5	0
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/youth	RRH	1	0	>50%	50%	<50%	Application & APR served	1	0	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender, disability)	RRH	5	5	5	Up to 1 point per item, per review	<1	Furthering Equity Report Review form up to 1 point per action item met.	5	per scoring review	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	RRH	5	0	Yes >=25%	Yes <25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence).	RRH	5	0	Yes >= 25%	25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0

PIP PLAN BENCHMARK Points

Possible Points	120	67.5
	66	

Performance Improvement Evaluation

Does project fall below 2024 Benchmark?

No

If Yes, PIP required before submittal to HUD

Was Project under PIP in 2023?

No

If the Project was under PIP in 2023, Include warning of final year allowed under PIP

If the Project was under PIP in both 2022 and 2023, review for Reallocation

2024 Benchmark Base: Fam = 6437; IND = 11691; Mixed = 13,194

PSH RENEWAL RATING TOOL 2024

Agency

Project

Project Type

Project Identifier

Interfaith Community Services

Rental Assistance Program

PSH Renewal

Team Reviewer

Review complete

yes

Category	Criteria	Project Type	Max Points Possible	Points Awarded	Benchmark for full Points	Partial Benchmark 2 (50-99%)	Partial Benchmark 3 (less than 50%)	Data Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	PSH	0	Y	Yes			CoC Monitoring - Documentation, etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	PSH	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (Commitment)	PSH	0	Y	Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	PSH	0	Y	Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	PSH	0	Y	Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	PSH	0	Y	Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	PSH	0	Y	Yes			Threshold Review Page & Sources	0	0	0
Exit to Permanent Housing	Minimum percent remain in or move to permanent housing	PSH	25	25	>= 91%	45.5% - 90%	< 45.5%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project # of days	PSH	5	5	>= 1090 days	545-1089 days	< 545 days	APR Q	5	2.5	0
New or Increased Earned Income	Minimum new or increased earned income for project leavers	PSH	2	0	>=8%	4-7.99%	< 4%	APR Q	2	1	0
New or Increased Earned Income	Minimum new or increased earned income for project stayers	PSH	2	0	>=11%	5.5% - 10.9%	< 5.5%	APR Q	2	1	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project leavers	PSH	3	0	>=41%	20.5% - 40.9%	<20.5	APR Q	3	1.5	0
New or Increased Income and Non-Earned Income	Minimum new or increased non-employment income for project stayers	PSH	3	0	>=55%	27.5% - 54.5%	< 27.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	PSH	5	5	>=90%	80-89%	<80%	Housing First Scoring Tool completed & % of total p	5	3	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	PSH	5	5	0 Issues	2 issues / corrected	substantial deficiency risk	Audit/ Monitoring Review Form	5	3	0
Project Effectiveness	CoC Review - management; documentation	PSH	4	4	0 Issues	1-2 issues	more than 2 issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	PSH	6	6	>= 95%	>=90-94%	< 90%	F-LOCES report; use of funds; grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	PSH	12	12	<= 5 % (no more than 5% above benchmark)	<=7% No more than 7% above benchmark	>7.% or more above benchmark	Full points= Not more than 5% above average cost per successful exit (Project Budget; APR ; and Cost Chart)	12	6	0
Project Effectiveness - Returns to Homelessness	Maximum percent of participants return to homelessness @ Exit	PSH	15	15	<=7%	>7-10.5%	>10.5%	HMIS Report	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	PSH	5	5	>=39%	19% - 38%	< 19%	APR calculation	5	2.5	0
Serves High Need Populations (severe service need)	Minimum percent of participants with 2 or more disabilities	PSH	5	5	>=55%	27.5% - 54.9%	< 27.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	PSH	5	2.5	>=36%	18% - 35.9%	< 18%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	PSH	1	0	100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project is serve CH	PSH	1	1	>=100%	50	<50%	APR Q served	1	0.5	0
Priority Vulnerable Population - Seniors/Youth	% Service to Seniors/youth	PSH	1	1	>50%	50%	<50%	Application & APR served	1	0	0
Furthering Racial Equity - Service to underserved groups Implemented actions	Implemented action to address inequity (race, gender, disability)	PSH	5	5	= 5	Up to 1 point per item - scoring review	< 1	Furthering Equity Report Review form up to 1 point per action item met.	5	per scoring review	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	PSH	5	0	Yes >= 25% Leverage	Yes < 25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -CoC or ESG source (with evidence).	PSH	5	0	27% and Above	25%	NA	Application/ MOU, Leverage letter, contract for non CoC /ESG Housing	5	3	0

	Possible Points	120	96.5
PIP PLAN BENCHMARK Points		66	
Performance Improvement Evaluation			
Does project fall below 2024 Benchmark?		no	
If Yes, PIP required before submittal to HUD		no	
Was Project under PIP in 2023?			
If the Project was under PIP in 2023, Include warning of final year allowed under		no	
If the Project was under PIP in both 2022 and 2023, review for Reallocation		NA	

2024 Benchmark Base: Fam = 6437; IND = 11691; Mixed = 13,194

JOINT RENEWAL TOOL 2024

Agency
Project
Project Type
Project Identifier

Interfaith Community Services
Path to Permanence
JOint Renewal

Team Reviewer

Review complete
yes

					Partial						
Category	Criteria	Project_Type	Max Points Possible	Points Awarded	Benchmark for full Points (100%)	Partial Benchmark 2 (50-99%)	Benchmark 3 (<50%)	Data_Source	Points Full Benchmark	Points Benchmark 2	Points Benchmark 3
HUD CoC Thresholds	Acceptable organization general review (CoC)	Joint	0	y	Yes			CoC Monitoring - Documentation.etc	0	0	0
HUD CoC Thresholds	Application is complete and has required attachments	Joint	0		Yes			Review Checklist	0	0	0
HUD CoC Thresholds	Coordinated Entry Participation (commitment)	Joint	0	y	Yes			Signed Commitment Form on Intent	0	0	0
HUD CoC Thresholds	Documented, secured minimum match	Joint	0	y	Yes			Application - Signed agreements	0	0	0
HUD CoC Thresholds	Commit to Housing First and/or Low Barrier Implementation	Joint	0	y	Yes			Commitment Signed	0	0	0
HUD CoC Thresholds	Project Participation in HMIS	Joint	0	y	Yes			Commitment or active project in HMIS/DV	0	0	0
HUD CoC Thresholds	HUD Applicant Eligibility Thresholds Review	Joint	0	y	Yes			Threshold Review Page & Sources	0	0	0
Exits to Permanent Housing	Minimum percent move to permanent housing	Joint	25	12.5	>=68%	34% - 67%	< 34%	APR calculation	25	12.5	0
Length of Stay	On average, participant who left stayed in project XX days (quick movement)	Joint	5	5	<=334 days	335-500 days	> 500 days	APR calculation	5	2.5	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project leavers	Joint	2	2	>=22%	11% - 21%	< 11%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased earned income for project stayers	Joint	2	2	>=35%	17.5% - 34%	< 17.5%	APR Q	2	1	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project leavers	Joint	3	3	>=8%	4%- <8%	< 4%	APR Q	3	1.5	0
New or Increased Income and Earned Income	Minimum new or increased non-employment income for project stayers	Joint	3	3	>=3%	1.5%- 3%	< 1.5%	APR Q	3	1.5	0
Project Effectiveness	Housing First and/or Low Barrier Implementation	Joint	5	5	>=90%	80%-89%	<80%	Self Assessment Tool Score	5	2.5	0
Project Effectiveness	Audit Monitoring- Documented organization financial stability	Joint	5	5	0 Issues	2 Issues / corrected	substantial deficiency - risk	Audit/ Monitoring Review Form	5	2.5	0
Project Effectiveness	CoC Review - management; documentation	Joint	4	4	0 Issues	1 issue	2 or more issues	CoC & Other funder Monitoring	4	2	0
Project Effectiveness	Use of Funds - spending rates; unspent funds, slow spending; includes recapture \$	Joint	6	0	>= 95%	>=90%-94%	< 90%	E-LOCES report;use of funds grant closeout reports	6	3	0
Project Effectiveness	Project has reasonable costs per permanent housing exit as defined locally	Joint	12	12	<= 5 % above	<=7% above	>7% above	Not more than 5% above average cost per successful exit	12	6	0
Project Effectiveness -Returns to Homelessness	Maximum percent of participants return to homelessness @ exit	Joint	15	7.5	<=2%	>2% - 3%	> 3%	APR Calculation	15	7.5	0
Serves High Need Populations	Minimum percent of participants entering project from place not meant for human habitation	Joint	5	5	>=40.5%	20%-40%	< 20%	APR calculation	5	2.5	0
Serves High Need Populations (S	Minimum percent of participants with 2 or more disabilities	Joint	5	5	>=25%	12.5% - 24%	< 12.5%	APR calculation	5	2.5	0
Serves High Need Populations	Minimum percent of participants with zero income at entry	Joint	5	2.5	>=42%	21% - 41%	< 21%	APR calculation	5	2.5	0
Priority Vulnerable Population - DV	Project dedicated to DV	Joint	1	0	100%	NA	NA	Intent Form, HIC designation	1	0	0
Priority Project - Chronic	Project % serve CH	Joint	1	0	100%	50%	<50%	APR Q - served	1	0.5	0
Priority Vulnerable Population - Seniors	% Service to Seniors/Youth	Joint	1	0	>50%	50%	<50%	Application & APR dedicated	1	0.5	0
Furthering Racial Equity - Service to underserved groups	Implemented action to address inequity (race, gender,disability)	Joint	5	5	5	up to 1 point per action	<1	Furthering Equity Report Form, up to 1 point per action item met.	5	4	0
System Priority - Health Care Leverage Non CoC ESG	Integrates Health Leverage (Has MOU)	Joint	5	0	Yes>=25%	Yes<25%	No	Has Healthcare MOU , non CoC or ESG	5	2	0
System Priority - HOUSING Leverage	Provides 25% or more Housing assistance from non -COC or ESG source (with evidence)	Joint	5	0	Yes >=25%	Yes <25%	N/A	Application/ MOU, Leverage letter, contract for non-CoC /ESG Housing	5	3	0
		Possible points	120	78.5							
PIP Benchmark points			66								

2024 Base =Families
5%=8987 7%=9158; 5%
IND=6249 7%=6368;
Mixed 5%=10580
7%=10781
Updated 9.26

Performance Improvement Evaluation
Does project fall below 2024 Benchmark?
If Yes, PIP required before submittal to HUD
Was Project under PIP in 2023?
If the Project was under PIP in 2023, Include warning of final year allowed under PIP

no
no
NA

FY 2024 Furthering Equity Report Form

Please complete this form to the best of your ability. Once complete, please save the document in PDF format and upload to your agency's FY 2024 NOFO "Equity Evidence" Dropbox subfolder with other attachments.

Agency Name:	Interfaith Community Services
Name of Person Submitting Form:	Lauren Varner
Job Title of Person Submitting Form:	Director of QA, Compliance, and Grants

Section I: Agency Leadership, Governance, Staff, and Policies

1. Does your agency currently have an existing Diversity, Equity, and Inclusion Policy, Yes or No?

If so, please attach evidence of your organization's current DEI policy. If a DEI Policy does not currently exist at your agency, please provide us with more information explaining why.

Yes; please see the uploaded documents. In January 2023, the agency released a DEIA Statement, which serves as our formalized, organizational commitment to Diversity, Equity, Inclusion, and Anti-Racism. Additionally, Interfaith has developed a microaggression policy that focuses on providing education around microaggression to all staff. The policy also identifies means for reporting and addressing issues.

2. Does your agency currently have under-represented individuals (BIPOC, LGBTQ+, etc.) in managerial, leadership, and front-line staff positions that reflect the populations your agency serves? Please provide us with a narrative describing the specific populations your agency serves, information regarding your agency's assessment of the compositional breakdown of your agency's staff (managerial, leadership, and front-line staff) and board, and how your agency measures success/outcomes in this area. We also ask that you provide us with data from your assessment in the following data charts provided.

The Agency currently does have under-represented individuals serving as front-line staff and in managerial roles throughout the agency, which is representative of the populations Interfaith serves (please refer to staffing charts below).

Last fiscal year, Interfaith's client population included the following:

- 10.5% African American
- 59% Hispanic/Latino/e/o
- 51% Females
- 6% Non-Traditional or Non-Conforming Gender identities
- 8% Transition Age Youth
- 35% Persons with disabilities
- 25% Persons experiencing homelessness
- 10% Persons 65 years+

As part of the efforts of a staff-led Diversity Equity Inclusion & Anti-Racism (DEIA) Working Group, Interfaith's recruitment and hiring policies and procedures were reviewed to ensure they promote equity and diversity in the workforce, reduce barriers to entry, and are fully accessible. One of the first priorities of the DEIA WG was

to remove employment barriers to increase equity and diversity. This included the re-evaluation of various hiring practices to be more inclusive. Beginning in 2021, Interfaith partnered with Success Beyond Measure, Inc, a diversity consulting firm, to continue its DEIA journey. Success Beyond Measure facilitated staff listening sessions, which informed further goals and initiatives of the DEIA WG. Interfaith implemented anti-racism training for all staff (195 staff during the initial training roll-out) and the training is integrated into onboarding. The DEIA WG also established a DEIA resource library and Latinx staff affinity group.

Front-Line Staff Composition		
Organizations define which roles are considered front-line staff positions. Ensure consistency in categorizations and avoid duplication when reporting.		
Demographic Category	Total Number	%
Black, African American, or African	21	10%
Hispanic/Latina/e/o	93	44%
Female	137	66%
Male	68	32%
Non-Traditional or Non-Conforming Gender identities (e.g. Culturally Specific Identity, Transgender, Non-Binary, Questioning, or Other)	4	2%
Persons with a Disability	8	4%
Persons with Lived Experience of Homelessness	43	21%
Persons 18 and under and Transitional Age Youth (18-24)	17	8%
Persons 25-54 years of age	146	70%
Persons 55 years of age and older	46	22%

Manager and Leadership Composition		
Positions include managerial and leadership roles in the organization and board. Ensure consistency in categorizations and avoid duplication when reporting.		
Demographic Category	Total Number	%
Black, African American, or African	1	2%
Hispanic/Latina/e/o	18	38%
Female	33	70%
Male	14	30%
Non-Traditional or Non-Conforming Gender identities (e.g. Culturally Specific Identity, Transgender, Non-Binary, Questioning, or Other)	0	0%
Persons with a Disability	0	0%
Persons with Lived Experience of Homelessness	6	13%
Persons 18 and under and Transitional Age Youth (18-24)	0	0%
Persons 25-54 years of age	36	77%
Persons 55 years of age and older	11	23%

3. Does your agency currently have a relational process for receiving and incorporating feedback from persons with current or lived experiences of homelessness? Please provide us with a narrative detailing the various methods used to incorporate feedback from persons with lived experience of homelessness to help inform

policy and decision making. The narrative should include an example, of how feedback was used to help improve policy, protocols, or program design/s. Please also attach evidence of current feedback methods used (Ex: Existing Participant Feedback Surveys, Examples of a past Lived Experience Solicitation for Feedback/Forum meeting invitations, Meeting Agenda, etc.). **Please make sure not to submit any documentation that includes personally identifiable information of clients served (or persons with lived experience of homelessness).**

Yes, the agency uses several methods to incorporate client feedback including customer satisfaction surveys, resident meetings, and a thorough grievance and appeal process so we may understand issues that clients are experiencing and make needed improvements. Program leadership reviews client satisfaction surveys on a regular basis to incorporate feedback as much as possible. Interfaith has updated several policies based on direct client feedback including program termination/exit policies, staff training requirements, and policies surrounding staff roles and responsibilities. In addition to internal agency methods, Interfaith also participates as a provider utilizing a Pulse for Good Kiosk, which is positioned at Interfaith's main office location. Please see uploaded customer satisfaction surveys. In 2024, Interfaith also instituted a system called Safe Hotline, which is an anonymous way that anyone can provide feedback to the agency.

Section II: Program Participant Outcomes

4.a. Has your agency reviewed program level data (data by race, ethnicity, gender identity, age and/other underserved populations) with an equity lens and identified any potential programmatic changes needed to make program participant outcomes more equitable? (e.g. a review of how persons are served and move through the program to permanent housing or achieve housing stability with an equity lens using HMIS data). Please provide us with a narrative describing your agency's review and results.

The Agency reviews agency-wide demographic data at least annually. In July 2024, Interfaith created a framework for a new Quality Assurance Committee that will have an emphasis on alignment to our DEIA values. Part of the duties of the committee will be to review program-level data related to the following:

- **Service Delivery Metrics:** Evaluation of how well the agency meets its service delivery goals, including timeliness, accessibility, and adherence to standards.
- **Client Satisfaction:** Results from surveys or feedback forms indicating the satisfaction levels of clients who receive services.
 - **Improvement Projects:** Integrating and monitoring results, including successes and areas for development, of Quality Assurance and DEIA principles throughout the organization.
- **Outcome Measures:** Data on the effectiveness of services in achieving the intended outcomes for clients.

4.b. Expanding on question 4.a., what actions have been taken or will be taken to develop and implement equitable program policies that do not impose undue barriers? Please provide a narrative describing your agency's action plan.

Interfaith Community Services has been working in the realm of Diversity, Equity, Inclusion, and Anti-Racism (DEIA) for the past three and a half years. During that time, we have taken several important steps to ensure that our organization is consistently striving to demonstrate greater levels of equity as a workplace and in our

approach to providing vital services and resources to our clients. In January 2023, the agency released a DEIA Statement, which serves as our formalized, organizational commitment to Diversity, Equity, Inclusion, and Anti-Racism. Program policies are being reviewed on an ongoing basis to ensure consistency with this statement and to ensure our clients experience no undue barriers to receiving services. Interfaith contracts with a DEIA consultant to provide direct support and review of policy alignment with Interfaith's goal of being an inclusive, equitable, and diverse environment dedicated to dismantling systems of oppression.



Journey to Becoming an Anti-Racist Organization

A discussion of Interfaith's ongoing evolution in the DEIA space...



Our Commitment to DEIA

Interfaith aspires to ensure a just and equitable work environment by engaging in the development of internal policies, practices, and procedures that allow all Interfaith staff, volunteers, collaborators, and donors to feel valued, supported, and respected. Our pledge to combat systemic racism and all forms of oppression and marginalization is central to our mission. As a leader and community partner, we work diligently to bring to fruition our vision of a society in which all people can lead healthy, self-sufficient lives.



Our Evolution

Racial Justice Working Group

Established in the wake of George Floyd's murder. Multi-city faith leaders' coalition also established

Jun 2020

Removal of Employment Barriers

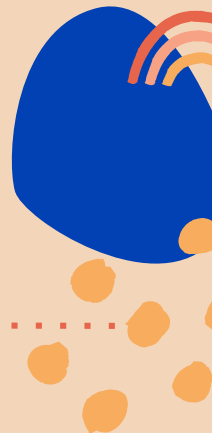
Re-evaluated various hiring practices to be more inclusive

Jul-Nov 2020

Success Beyond Measure, Inc.

Partnered with the diversity consulting firm to assist in our DEIA evolution

Feb 2021



Our Evolution

Staff Training

Completion of anti-racism training for all current staff members.

Aug 2021

Library

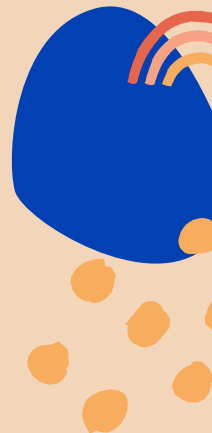
Formal launch of our DEIA resource library at our 613 location. Goal is to expand as a sort of internal library.

Dec 2021

Broadening Scope

Review of listening sessions; micro-aggression policy/handbook; internal recruitment efforts

Now



DEIA STRATEGY



Removal of Barriers

Continual barrier analysis of employment and promotional opportunities as well as career advancement via our PCA program



Policy

Continual matching of intent and culture into our policies and practices



Education

Initial staff training and supplemental training to go accompany new policies w/goal of ongoing DEIA training



Guiding Principles

What we are doing

Being Accountable

Listening

Learning

What we aim to achieve

Assessing ourselves internally and setting up processes and systems to be and stay accountable

Listening sessions, ongoing discussions within the DEIA group meetings, ongoing engagement with the Board

Completed and ongoing trainings, brown bag sessions, & DEIA Resource Library



Important Numbers & Milestones

19*



of employees hired due to changes in hiring policies and practices

12*



of employees that have utilized our PCA program in 2021

195



of employees that received DEIA training as of 10/3/2021

26



of books donated to Interfaith's DEIA Resource Center

7



of listening sessions executed amongst staff; completed as of 12/2021

8



of staff actively involved in the DEIA Working Group

Upcoming Goals

Projects

- Recruitment
- DEIA Calendar

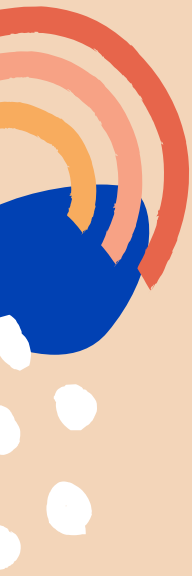
Initiatives

- Micro-Aggression Policy
- DEIA Brown Bags
- DEIA Resource Library Expansion
- Interfaith Family Traditions

Future Goals

- Currently fleshing out data from the listening sessions which will then inform and determine future steps/goals in our DEIA work





Thank you

Do you have any questions?
DEIA@interfaithservices.org
www.interfaithservices.org



Success Beyond Measure Consultants
nathanjsessoms@gmail.com
deblump@gmail.com

Special thanks to HR Coordinator **Odetta Delsol** and
former Communications Manager **Shira Jacobs** for
their leadership creating this presentation





HOUSING FIRST REQUIREMENTS

Description

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold) and does not terminate program participants from the project for lack of participation in the program (e.g., supportive service participation requirements or rules beyond normal tenancy rules).

HOUSING FIRST REVIEW CHECKLIST

Agency Name: _____

Project Name(s): _____

Documents Provided

Each organization is asked to provide evidence of how they implement Housing First in their projects. Use this checklist to indicate the type of forms that were provided for your review:

____ Program Policies and Procedures

____ Program Intake form

____ Notices to clients (Participant Handbook, Program Rules, and Expectations, etc.)

____ Termination Policy

____ Sample lease agreements (PSH programs)

Other: Identify _____



Check if the statement is accurate:

Housing First: Specific Conditions at Entry

_____ does not require a minimum level of income at entry

_____ does not screen out for substance use

_____ does not screen out for criminal record except as mandated by the state (manufacture/sales of illegal substances in past 5 years, conditions related to registered sex offender)

_____ does not screen out persons with a history of victimization (DV, assault, abuse)

Reviewer Notes:



Conditions Related to Termination of Housing

_____ does not require additional steps (e.g., a required stay in transitional housing or a certain number of days of sobriety) when program participants determine that they want assistance moving into permanent housing.

_____ does not terminate housing for failure to participate in supportive services—not including case management that is for the purposes of engagement only;

_____ does not terminate for failure to make progress on a service plan;

_____ does not terminate for loss of income or failure to improve income; and

_____ does not terminate for other activities not covered in a lease agreement

Reviewer Notes:



RESULTS OF REVIEW

____ Housing First Validated: (All conditions met):

____ Housing First Integrity documents need the following minimal corrections (e.g. no mention of a specific item needed):

Reviewer Notes:

____ Housing First Integrity not evidenced in documents:

Review Date: _____

Reviewer Initials: _____



Contract #: CA0944L9D012213	Provider Name/Recipient: Interfaith Community Services
On-Site Visit Program: Raymond's Refuge	Subrecipient: N/A
Date of Monitoring: 02/02/2024- 02/29/2024 Date of Monitoring Report: 3/7/2024 Monitoring Visit: 2/28/2024	CoC Staff Member(s): Kat Durant (KD), Chief Program Officer and Alma Vasquez (AV), CoC Program Coordinator
<p>The recipient/subrecipient's receipt or acceptance of this technical assistance plan is an acknowledgment that the recipient's proposed plan may resolve the identified deficiency. This approval shall not be construed as a waiver by the Continuum of Care or HUD of any right, power, or remedy under the contract or federal law.</p>	
<p>Please Note: A <i>finding</i> is a deficiency in program performance based on material noncompliance with a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized. A finding, depending on the nature, may be immediately reportable to HUD. A <i>concern</i> is a deficiency in program performance and will result in a finding if the concern is not corrected by the requested date in the corrective action plan</p>	

Finding #1
Chronic Homelessness Status Recordkeeping
<p>The CoC reviewer reviewed 2 client records during the monitoring visit and both files either:</p> <ol style="list-style-type: none"> 1. Did not have enough certification/ evidence to document all 12 months of homelessness to qualify. 2. Documentation was insufficient. Did not include dates of when observations were conducted, lack of narratives/detail (With no contact dates and so certification cannot verify which months are being certified for eligibility purposes). 3. When utilizing HMIS as a third-party source did not attach source documentation used with the certification. <p>Client records reviewed: 0FC72A7FD 6995E0441</p>
Specific Actions:
<p>CoC recipient will have 30 business days to provide a written corrective action plan that demonstrates how ICS will conduct program monitoring, train staff, and update client records to ensure all clients served met eligibility requirements at project entry (have proper eligibility documentation in the client record).</p>



Please email the written corrective action plan to alma.vasquez@rtfhdsd.org.

Deadline: April 18th, 2024

Process Measure/Outcome:

Once the written corrective action has been received. The CoC reviewer will review it and determine if the plan is sufficient and includes specific action teams to be taken and dates when actions are expected to be completed.

Discussion Items for Meeting:

Program Description:

Raymond's Refuge is a PSH project with 8 units and 16 beds. Grant started in 2011 and has Coc funding for Supportive Services, Operating, HMIS, and Admin dollars. 100% dedicated to chronically homeless. Serves adults 55 and over.

Monitoring Summary

Client File Privacy Check- Client records are stored in a locked file cabinet behind a locked door.

Client File Review- See finding #1. No other concerns will client files.

CoC Housing First Implementation Evaluation- Documents submitted during remote monitoring were reviewed and all specific condition were met and Housing First was validated on 2/8/2024.

Resources:

- [Recordkeeping Requirements for Chronic Status](#)
- [At A Glance: Chronic Homelessness Status](#)
- [Chronic Homelessness Documentation Form – San Diego City and County CoC Standard Form](#)

Program Performance Goals:

Date:

No program goals identified at this time.



Provider Information

Please complete the information below on the organization being assessed.

Provider Information	
Provider's Legal Name	Interfaith Community Services
Acronym (If Applicable)	ICS
Year Incorporated	1982
EIN	N28YBWSB8UU8
Street Address	550 W Washington Ave
Zip Code	92025

Project Information	
Project Name	Raymond's Refuge
Project Budget	113,966
Grant Number	CA0944L9D012314
Name of Project Director	Patricia Mack
Project Director Email Address	Pmack@interfaithservices.org
Project Director Phone Number	760-489-6380 ext. 234
Which best describes the project *	Permanent Supportive Housing
<i>If project is a Safe Haven, please choose project type that it most operates like, e.g. shelter, transitional housing, or permanent housing</i>	
Are your services targeted to any of the following populations specifically? Please select one if so, as this impacts your assessment questions.	
None of the above	

*Please note that when you select a project type, particular standards may not be relevant.

Management Information	
Name of CEO	Greg Anglea
CEO Email Address	ganglea@interfaithservices.org
CEO Phone Number	760-489-6380 ext. 230

Name of Staff Member Guiding Assessment	Lauren Varner
Staff Email Address	lvarner@interfaithservices.org
Staff Phone Number	760-546-8605

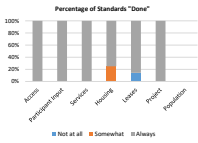
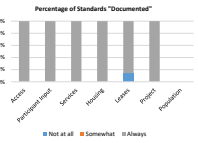
Assessment Information	
Name of Assessor	Elizabeth Hernandez
Organizational Affiliation of Assessor	PSH Program Manager
Assessor Email Address	E.hernandez@interfaithservices.org
Assessor Phone Number	760-270-5279
Date of Assessment	Sep 10 2024



Some standards have not been evaluated. Please return and complete all standards before finalizing report.

Your score: 173
Max potential score: 250

Score is calculated by awarding 1 point for standards answered 'sometimes' and 2 points for standards answered 'always'. Categories that are not applicable for your project are not included in the maximum potential score.





This page does not comprise part of the assessment. It is for information only.

Numbers	Access			Participant Input			Services			Housing			Leases			Project-specific			Population		
	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always
Please select answer	0			0			0			0			0			-6			3		
Say it	0	0	7	0	0	2	0	0	7	0	0	4	1	0	6	0	0	3	0	0	0
Document it	0	0	7	0	0	2	0	0	7	0	0	4	1	0	6	0	0	3	0	0	0
Do it	0	0	7	0	0	2	0	0	7	0	1	3	1	0	6	0	0	3	0	0	0
Checks																CHECK			CHECK		

Percentages	Access			Participant Input			Services			Housing			Leases			Project-specific			Population		
	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always	Not at all	Somewhat	Always
Please select answer	0%			0%			0%			0%			0%			-200%			75%		
Say it	0%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%	100%	14%	0%	86%	0%	0%	100%	0%	0%	0%
Document it	0%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%	100%	14%	0%	86%	0%	0%	100%	0%	0%	0%
Do it	0%	0%	100%	0%	0%	100%	0%	0%	100%	0%	25%	75%	14%	0%	86%	0%	0%	100%	0%	0%	0%
Number of standards	7			2			7			4			7			3			4		

'Say It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	14%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	100%	100%	100%	100%	86%	100%	0%
Check							

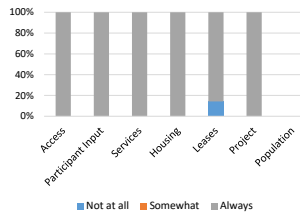
'Document It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	14%	0%	0%
Somewhat	0%	0%	0%	0%	0%	0%	0%
Always	100%	100%	100%	100%	86%	100%	0%
Check							

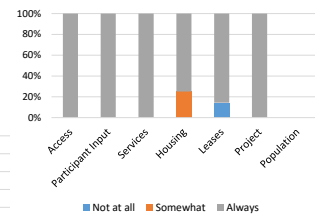
'Do It'

	Access	Participant Input	Services	Housing	Leases	Project	Population
Not at all	0%	0%	0%	0%	14%	0%	0%
Somewhat	0%	0%	0%	25%	0%	0%	0%
Always	100%	100%	100%	75%	86%	100%	0%
Check							

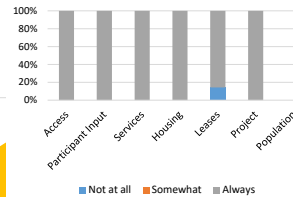
"Say It" Standards, by Category and Response



"Do It" Standards, by Category and Response



"Document It" Standards, by Category and Response



Supportive Housing Standards Rating		Pointer
Start	0	Value 173
Initial	15	Pointer 3
Middle	45	End 180
End	40	
Max	100	

Score: 173

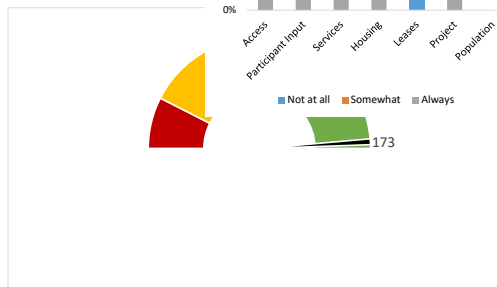
Standard Numbers	With special pop	Without special pop
Coordinated entry	16	12
Street outreach	16	12
Emergency shelter	27	23
Transitional housing	34	30
Rapid rehousing	34	30
Permanent supportive housing	34	30

Max answer score (for 'always') 6 3 categories (say, document, do) x 2 max points for 'always'

Answer Numbers	With special pop	Without special pop
Coordinated entry	96	72
Street outreach	96	72
Emergency shelter	162	138
Transitional housing	204	180
Rapid rehousing	204	180
Permanent supportive housing	204	180

Project type	Permanent Supportive Housing	3
Special population	None of the above	0

Evaluation max score 180



**1E-5 Notification of Projects Rejected – Reduced
Cover**

Catholic Charities – Rachels Rapid Rehousing Program

Email Screenshot with attachments

Notice

Women's Resource Center – Women's Resource Center -TH

Email Screenshot

Notice

Local Competition Selection Results

 Active   
 

More

More

5:28 PM (11 minutes ago) ☆ ↩ ⋮

Thank you for your commitment to alleviating homelessness in our communities.



RTFH
SAN DIEGO'S
REGIONAL LEADER
ON HOMELESSNESS

Click [here](#) to explore RTFH research and publications on homelessness in San Diego.



NOTICE of PROJECT REALLOCATION or REJECTION

To: Catholic Charities, Diocese of San Diego
Re: 2024 CoC NOFO Application REALLOCATION or REJECTION
Date: October 10, 2024

The Regional Task Force on Homelessness (RTFH) and the Continuum of Care (CoC) Board established a Rating and Ranking Group to review, score, and rank project applications for funding from the U.S. Department of Housing and Urban Development (HUD) 2024-25 CoC NOFO Competition.

Per HUD guidelines, YHDP projects listed on our Grant Inventory Worksheet (GIW) are exclusively for YHDP use and are not ranked in order but must be included in the CoC Application. Projects with less than one year of service, which have not had sufficient time to demonstrate annual outcomes, are protected from involuntary reallocation.

The scoring tool was populated with objective data, and the local review process incorporated benchmarks tailored to different program types and included interim point values. Emphasis was placed on promoting equity for over-represented and underserved groups. In addition to raw score assessments, the CoC Board adopted a series of priorities, which were combined to determine rank order and project allocations. Ranking strategies and protocols that could affect placement were included in the rating materials. If project performance weaknesses were identified, a Performance Improvement Plan (PIP) was initiated. Projects subject to a PIP are noted in the Notice. The 2024 Rating and Ranking process also continues the Reallocation Policies, including the Chronic Underspending Reallocation Policy. Additional information is available on the [RTFHSD.org website](https://www.rtfhsd.org).

Low-scoring projects that fall below the available funding threshold for 2024 will not be recommended for inclusion in the HUD application. This notice provides the results of the scoring and ranking process for one or more of your organization's submitted projects.

The Rachel's Rapid Rehousing Renewal project has been reallocated due to failing to meet the minimum threshold score of 55% for the third consecutive year. Please refer to the attached Ranking Order and Funding Allocation List for detailed information about your project(s) regarding acceptance, rejection, or reallocation. This year, HUD's NOFO required a specific format for the rank order listing, and the attached information is presented accordingly.

Thank you in advance for your cooperation in concluding the 2024 local review process. On behalf of the individuals and families we serve, we look forward to working together to submit the strongest possible application in the national competition.

Respectfully,



Tamera Kohler
Chief Executive Officer
Regional Task Force on Homelessness

NOTICE of PROJECT REALLOCATION or REJECTION

To: Women's Resource Center
Re: 2024 CoC NOFO Application REALLOCATION or REJECTION
Date: October 10, 2024

The Regional Task Force on Homelessness (RTFH) and the Continuum of Care (CoC) Board established a Rating and Ranking Group to review, score, and rank project applications for funding from the U.S. Department of Housing and Urban Development (HUD) 2024-25 CoC NOFO Competition.

Per HUD guidelines, YHDP projects listed on our Grant Inventory Worksheet (GIW) are exclusively for YHDP use and are not ranked in order but must be included in the CoC Application. Projects with less than one year of service, which have not had sufficient time to demonstrate annual outcomes, are protected from involuntary reallocation.

The scoring tool was populated with objective data, and the local review process incorporated benchmarks tailored to different program types and included interim point values. Emphasis was placed on promoting equity for over-represented and underserved groups. In addition to raw score assessments, the CoC Board adopted a series of priorities, which were combined to determine rank order and project allocations. Ranking strategies and protocols that could affect placement were included in the rating materials. If project performance weaknesses were identified, a Performance Improvement Plan (PIP) was initiated. Projects subject to a PIP are noted in the Notice. The 2024 Rating and Ranking process also continues the Reallocation Policies, including the Chronic Underspending Reallocation Policy. Additional information is available on the [RTFHSD.org website](https://www.rtfhsd.org).

Low-scoring projects that fall below the available funding threshold for 2024 will not be recommended for inclusion in the HUD application. This notice provides the results of the scoring and ranking process for one or more of your organization's submitted projects.

The Women's Resource Center Renewal project has been reallocated due to the non-submission of a renewal application for the FY2024 CoC NOFO. Please refer to the attached Ranking Order and Funding Allocation List for detailed information about your project(s) regarding acceptance, rejection, or reallocation. This year, HUD's NOFO required a specific format for the rank order listing, and the attached information is presented accordingly.

Thank you in advance for your cooperation in concluding the 2024 local review process. On behalf of the individuals and families we serve, we look forward to working together to submit the strongest possible application in the national competition.

Respectfully,



Tamera Kohler
Chief Executive Officer
Regional Task Force on Homelessness



PUBLIC NOTICE

FY 2024 Continuum of Care (CoC)

Notice of Funding Opportunity (NOFO) Preliminary Results

The U.S. Department of Housing and Urban Development (HUD) requires the Collaborative Applicant for the Continuum of Care (CoC) to provide a series of public notices during the annual CoC NOFO Competition. The Regional Task Force on Homelessness (RTFH) and the Continuum of Care (CoC) Board established a Rating and Ranking Group to review, score, and rank project applications requesting funds under this competition. This year's project listing has been updated to comply with HUD's new Project Listing requirements and incorporates the following local elements:

HUD Project Listing Requirements

1. Project Name
2. Project Score
3. Project Status—Accepted, Rejected, Reduced Reallocated, Fully Reallocated
4. Project Rank
5. Amount Requested from HUD
6. Reallocated Funds (Added or Subtracted)

Local Requirements

- Renewal or New Project Status
- Funding Source Type (Planning Grant, ARD, DV Bonus, CoC Bonus, Reallocated Funds, or a mixture of funding sources)
- Less Than One Year (LTOY) Status - Projects with Less Than One Year (LTOY) status are not eligible for reallocation. As a result, their ranking may be adjusted to ensure they remain in Tier 1
- PIP Status- If a project falls below the local scoring threshold (66 points) and is not a LTOY, a PIP is required

FY 2024 NOFO Project Tiering

Tier 1 - Is set at 90 percent of the CoC's Annual Renewal Demand (ARD).

Tier 2 - Tier 2 represents the difference between Tier 1 and the total maximum amount a CoC can apply for, including **renewals, reallocation, and CoC Bonus funds.** .

Unranked Projects - CoC Planning grant, HMIS and CES grants, and YHDP projects.

Projects ranked 44 and higher are in Tier 2 and will compete in the national funding competition (includes some renewal projects and new projects seeking funding under DV Bonus and CoC Bonus).

LOCAL COMPETITION SELECTION RESULTS

Project Name	Score	Status	Rank	Amount Requested from HUD	Reallocated Funds (=reduction) \$=requested use	Renewal or New (R/N)	Fund Source (Status)	LTOY or PIP
CA 601 CoC Planning Grant		Accepted	Not Ranked	\$1,500,000	\$0	N/A	Planning	N/A
CES for DV Safety		Accepted	1	\$377,336	\$0	R	ARD	N/A
HMIS San Diego County		Accepted	2	\$734,003	\$0	R	ARD	N/A
CoC Regional CAHP		Accepted	3	\$707,000	\$0	R	ARD	N/A
SDHC Merged Grant	101	Accepted	4	\$4,755,568	\$0	R	ARD	N/A
Rental Assistance Program	96.5	Accepted	5	\$348,180	\$0	R	ARD	N/A
Alpha Rapid Rehousing (Consolidated)	96	Accepted	6	\$1,555,706	\$0	R	ARD	N/A
Ninth and F Street Apts.	96	Accepted	7	\$33,378	\$0	R	ARD	N/A
New Journey (Expanded 2021)	95	Accepted	8	\$866,258	\$0	R	ARD	N/A
North County Safe Haven	95	Accepted	9	\$218,941	\$0	R	ARD	N/A
Manzanita	94.5	Accepted	10	\$93,212	\$0	R	ARD	N/A
Casa de Luz	92	Accepted	11	\$606,782	\$0	R	ARD	N/A
Door of Hope Joint Th-RRH	90	Accepted	12	\$531,598	\$0	R	ARD	N/A
TACHS Prizm	89.5	Accepted	13	\$837,395	\$0	R	ARD	N/A
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CRC DV Bonus	88	Accepted	15	\$404,574	\$0	R	ARD	N/A
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Expanded Pathway to Housing - DV	93.5	Accepted	54	\$783,891	\$0	N	DV Bonus	
CRC DV Joint	93.5	Accepted	55	\$310,164	\$0	N	DV Bonus	
PRIZM Expansion (PSH)	75	Accepted	56	\$754,323	\$0	N	CoC Bonus	
Shared RRH	69	Accepted	57	\$429,740	\$0	N	CoC Bonus	
Moving Home Expansion	90	Accepted	58	\$1,982,137	\$0	N	CoC Bonus	
YHDP - CES		Accepted	Not Ranked	\$82,500	\$0	R	YHDP	
YHDP - HMIS		Accepted	Not Ranked	\$153,816	\$0	R	YHDP	

YHDP - Youth Navigation System		Accepted	Not Ranked	\$1,280,000	\$0	R	YHDP	
YHDP- Rapid Rehousing RRH		Accepted	Not Ranked	\$181,749	\$0	R	YHDP	
YHDP - TH-RRH Joint		Accepted	Not Ranked	\$2,234,279	\$0	R	YHDP	
YHDP - Host Homes		Accepted	Not Ranked	\$167,582	\$0	R	YHDP	

NOTICE of PROJECT REALLOCATION or REJECTION

To: Women's Resource Center
Re: 2024 CoC NOFO Application REALLOCATION or REJECTION
Date: October 10, 2024

The Regional Task Force on Homelessness (RTFH) and the Continuum of Care (CoC) Board established a Rating and Ranking Group to review, score, and rank project applications for funding from the U.S. Department of Housing and Urban Development (HUD) 2024-25 CoC NOFO Competition.

Per HUD guidelines, YHDP projects listed on our Grant Inventory Worksheet (GIW) are exclusively for YHDP use and are not ranked in order but must be included in the CoC Application. Projects with less than one year of service, which have not had sufficient time to demonstrate annual outcomes, are protected from involuntary reallocation.

The scoring tool was populated with objective data, and the local review process incorporated benchmarks tailored to different program types and included interim point values. Emphasis was placed on promoting equity for over-represented and underserved groups. In addition to raw score assessments, the CoC Board adopted a series of priorities, which were combined to determine rank order and project allocations. Ranking strategies and protocols that could affect placement were included in the rating materials. If project performance weaknesses were identified, a Performance Improvement Plan (PIP) was initiated. Projects subject to a PIP are noted in the Notice. The 2024 Rating and Ranking process also continues the Reallocation Policies, including the Chronic Underspending Reallocation Policy. Additional information is available on the [RTFHSD.org website](https://www.rtfhsd.org).

Low-scoring projects that fall below the available funding threshold for 2024 will not be recommended for inclusion in the HUD application. This notice provides the results of the scoring and ranking process for one or more of your organization's submitted projects.

The Women's Resource Center Renewal project has been reallocated due to the non-submission of a renewal application for the FY2024 CoC NOFO. Please refer to the attached Ranking Order and Funding Allocation List for detailed information about your project(s) regarding acceptance, rejection, or reallocation. This year, HUD's NOFO required a specific format for the rank order listing, and the attached information is presented accordingly.

Thank you in advance for your cooperation in concluding the 2024 local review process. On behalf of the individuals and families we serve, we look forward to working together to submit the strongest possible application in the national competition.

Respectfully,



Tamera Kohler
Chief Executive Officer
Regional Task Force on Homelessness

1E-5a. Notification of Projects Accepted

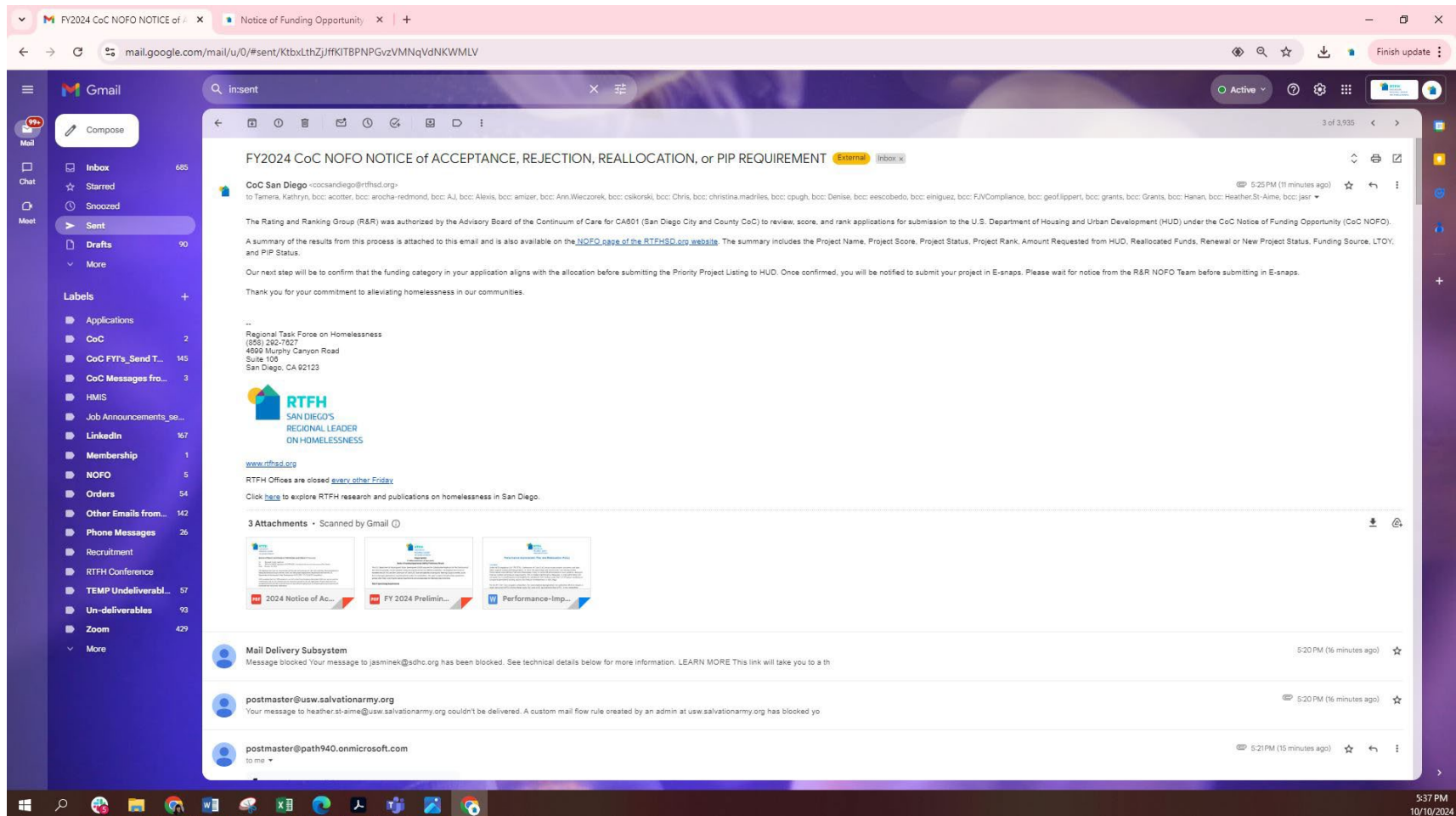
COVER

Mass Email Notification – Screenshot

Web posting Screenshot

Copy of Notice

1E-5a. Notification of Projects Accepted Email Notice Screenshot



1E -5b. Local Competition Selection Results

Evidence of Web Posting 10.10.2024

The screenshot shows a web browser window with the URL rtfhsd.org/about-coc/notice-of-funding-opportunity-nofa/. The page content includes a table with dates and a list of documents under the heading "FY 2024-2025 CoC NOFO Documents".

Date	Event
Oct 18, 2024	Ranking
Oct 28, 2024	Local FY 2024 and FY 2025 Submitter to HUD via E-SNAPS
Oct 30, 2024	HUD Submittal Deadline for FY 2024 and FY2025 CoC Program Competitive Consolidated Application Submission (By 5 pm Pacific Time)

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- [FY 2024 Preliminary CoC Project Ranking](#) – posted 10/10/2024
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FY 2024-2025 CoC NOFO Policies

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- [Chronic Underspending Reallocation Policy](#) – posted 8/2/24
- [Performance Improvement Plan \(PIP\) and Reallocation Policy](#) – updated August 2024
- [2024 CoC NOFO Local Evaluation Process and Appeals Form](#) – posted 9/24/2024

The system clock in the bottom right corner of the screen shows 4:48 PM on 10/10/2024.

NOTICE of PROJECT ACCEPTANCE or PROVISIONAL ACCEPTANCE (PIP Required)

To: Renewal Project Applicant
Re: 2024 CoC NOFO Application ACCEPTANCE, including Performance Improvement Plan Notice
Date: October 10, 2024

The Regional Task Force on Homelessness (RTFH) and the Continuum of Care (CoC) Advisory Board established a Rating and Ranking Group to review, score, and rank project applications requesting funds from the U.S. Department of Housing and Urban Development (HUD) 2024 - 25 CoC NOFO Competition.

HUD mandates that the YHDP projects in our CoC on the Grant Inventory Worksheet (GIW) can only be used for YHDP Project and are not ranked order but should be included in the CoC Application. Projects that have not completed at least one year of service have not had sufficient opportunity to demonstrate annual outcomes are protected from involuntary reallocation.

Specific objective data was used to populate the scoring tool. The local review process has embraced benchmarks specific to various program types and included interim point values. The process increased emphasis on fostering equity for over-represented and under-served groups. In addition to the rating tools used to assess the raw score for each project, the RTFH Board adopted a series of priorities. These factors were combined to develop the rank order and project allocations. Ranking strategies and protocols that could impact the ranking were included in the rating material. When the review and scoring revealed a weakness in project performance in one or more areas, a Performance Improvement Plan (PIP) is initiated. Projects subject to PIP are identified in the Notice. The 2024 Rating and Ranking process continues the Reallocation Policies to reflect the PIP and to include the Chronic Underspending Reallocation Policy. More information on these is found on the [www.RTFHSD.org website](http://www.RTFHSD.org).

Low scoring projects that fell beyond the available funding for 2024 are not being recommended for inclusion in the application to HUD. This notice provides the results of the scoring and ranking process for one or more projects your organization submitted for consideration.

Please note that this initial notice is provisional and may be amended after completion of the local appeals process or budget adjustments. Inclusion in the 2024 CoC NOFA application to HUD does not guarantee funds. Final approval and allocations are determined by HUD as the result of national competition.

One or more of your applications have been accepted for inclusion in the FY2024 Application to HUD or has been accepted contingent upon receipt of a Performance Improvement Plan.

Projects scoring 66 or less are required to submit a Performance Improvement Plan in accordance with CoC Policy. Please see the list and scoring sheet posted in your FY2024 CoC NOFO DROPBOX for details your project(s) scores.

Please see the attached Ranking Order and Funding Allocation List for details about your project(s) with respect to acceptance, rejection, or reallocation. This year, the HUD NOFO established a required format for the rank order listing. The information is presented in that format.

Thank you, in advance, for your cooperation in bringing the local review process to a close.



PUBLIC NOTICE

FY 2024 Continuum of Care (CoC)

Notice of Funding Opportunity (NOFO) Preliminary Results

The U.S. Department of Housing and Urban Development (HUD) requires the Collaborative Applicant for the Continuum of Care (CoC) to provide a series of public notices during the annual CoC NOFO Competition. The Regional Task Force on Homelessness (RTFH) and the Continuum of Care (CoC) Board established a Rating and Ranking Group to review, score, and rank project applications requesting funds under this competition. This year's project listing has been updated to comply with HUD's new Project Listing requirements and incorporates the following local elements:

HUD Project Listing Requirements

1. Project Name
2. Project Score
3. Project Status—Accepted, Rejected, Reduced Reallocated, Fully Reallocated
4. Project Rank
5. Amount Requested from HUD
6. Reallocated Funds (Added or Subtracted)

Local Requirements

- Renewal or New Project Status
- Funding Source Type (Planning Grant, ARD, DV Bonus, CoC Bonus, Reallocated Funds, or a mixture of funding sources)
- Less Than One Year (LTOY) Status - Projects with Less Than One Year (LTOY) status are not eligible for reallocation. As a result, their ranking may be adjusted to ensure they remain in Tier 1
- PIP Status- If a project falls below the local scoring threshold (66 points) and is not a LTOY, a PIP is required

FY 2024 NOFO Project Tiering

Tier 1 - Is set at 90 percent of the CoC's Annual Renewal Demand (ARD).

Tier 2 - Tier 2 represents the difference between Tier 1 and the total maximum amount a CoC can apply for, including **renewals, reallocation, and CoC Bonus funds.** .

Unranked Projects - CoC Planning grant, HMIS and CES grants, and YHDP projects.

Projects ranked 44 and higher are in Tier 2 and will compete in the national funding competition (includes some renewal projects and new projects seeking funding under DV Bonus and CoC Bonus).

LOCAL COMPETITION SELECTION RESULTS								
Project Name	Score	Status	Rank	Amount Requested from HUD	Reallocated Funds (=reduction) \$=requested use	Renewal or New (R/N)	Fund Source (Status)	LTOY or PIP
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1E -5b. Local Competition Selection Results

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HUD Project Listing Requirements

1. Project Name
2. Project Score
3. Project Status—Accepted, Rejected, Reduced Reallocated, Fully Reallocated
4. Project Rank
5. Amount Requested from HUD
6. Reallocated Funds (Added or Subtracted)

Local Requirements

- Renewal or New Project Status
- Funding Source Type (Planning Grant, ARD, DV Bonus, CoC Bonus, Reallocated Funds, or a mixture of funding sources)
- Less Than One Year (LTOY) Status - Projects with Less Than One Year (LTOY) status are not eligible for reallocation. As a result, their ranking may be adjusted to ensure they remain in Tier 1
- PIP Status- If a project falls below the local scoring threshold (66 points) and is not a LTOY, a PIP is required

FY 2024 NOFO Project Tiering

Tier 1 - Is set at 90 percent of the CoC's Annual Renewal Demand (ARD).

Tier 2 - Tier 2 represents the difference between Tier 1 and the total maximum amount a CoC can apply for, including **renewals, reallocation, and CoC Bonus funds.** .

Unranked Projects - CoC Planning grant, HMIS and CES grants, and YHDP projects.

Projects ranked 44 and higher are in Tier 2 and will compete in the national funding competition (includes some renewal projects and new projects seeking funding under DV Bonus and CoC Bonus).

LOCAL COMPETITION SELECTION RESULTS								
Project Name	Score	Status	Rank	Amount Requested from HUD	Reallocated Funds (=reduction) \$=requested use	Renewal or New (R/N)	Fund Source (Status)	LTOY or PIP
CA 601 CoC Planning Grant		Accepted	Not Ranked	\$1,500,000	\$0	N/A	Planning	N/A
CES for DV Safety		Accepted	1	\$377,336	\$0	R	ARD	N/A
HMIS San Diego County		Accepted	2	\$734,003	\$0	R	ARD	N/A
CoC Regional CAHP		Accepted	3	\$707,000	\$0	R	ARD	N/A
SDHC Merged Grant	101	Accepted	4	\$4,755,568	\$0	R	ARD	N/A
Rental Assistance Program	96.5	Accepted	5	\$348,180	\$0	R	ARD	N/A
Alpha Rapid Rehousing (Consolidated)	96	Accepted	6	\$1,555,706	\$0	R	ARD	N/A
Ninth and F Street Apts.	96	Accepted	7	\$33,378	\$0	R	ARD	N/A
New Journey (Expanded 2021)	95	Accepted	8	\$866,258	\$0	R	ARD	N/A
North County Safe Haven	95	Accepted	9	\$218,941	\$0	R	ARD	N/A
Manzanita	94.5	Accepted	10	\$93,212	\$0	R	ARD	N/A
Casa de Luz	92	Accepted	11	\$606,782	\$0	R	ARD	N/A
Door of Hope Joint Th-RRH	90	Accepted	12	\$531,598	\$0	R	ARD	N/A
TACHS Prizm	89.5	Accepted	13	\$837,395	\$0	R	ARD	N/A
Door of Hope PSH	88.5	Accepted	14	\$210,599	\$0	R	ARD	N/A
CRC DV Bonus	88	Accepted	15	\$404,574	\$0	R	ARD	N/A
Village Rapid Rehousing	87	Accepted	16	\$1,591,612	\$0	R	ARD	N/A
PATH Connections Housing	86.5	Accepted	17	\$1,049,085	\$0	R	ARD	N/A
2015 Bonus Project	86.5	Accepted	18	\$1,680,001	\$0	R	ARD	N/A
CRC Rapid Re-housing Project	84.5	Accepted	19	\$301,497	\$0	R	ARD	N/A
Door of Hope Rapid Rehousing Program	84.5	Accepted	20	\$483,781	\$0	R	ARD	N/A
Boulevard Apartments	84	Accepted	21	\$59,963	\$0	R	ARD	N/A
Alpha Square	83.5	Accepted	22	\$564,911	\$0	R	ARD	N/A
Operations	83.5	Accepted	23	\$200,001	\$0	R	ARD	N/A
Journey Home	81.5	Accepted	24	\$568,839	\$0	R	ARD	N/A
El Norte Permanent Supportive Housing	80.5	Accepted	25	\$79,485	\$0	R	ARD	N/A
Rapid Rehousing Program - TAY	80	Accepted	26	\$863,664	\$0	R	ARD	N/A
Path to Permanence	78.5	Accepted	27	\$240,052	\$0	R	ARD	N/A
East County RRH - CSI	78.5	Accepted	28	\$431,337	\$0	R	ARD	N/A
Carlsbad RRH	77.5	Accepted	29	\$491,676	\$0	R	ARD	N/A
Benson Place	77.5	Accepted	30	\$359,152	\$0	R	ARD	N/A
The Lofts	76	Accepted	31	\$397,602	\$0	R	ARD	N/A
Next Step Renewal	72	Accepted	32	\$147,019	\$0	R	ARD	N/A

Las Casitas Permanent Supportive Housing	64	Accepted	47	\$72,356	\$0	R	ARD	PIP
Escondido Veterans Apartments	71.5	Accepted	33	\$290,003	\$0	R	ARD	N/A
San Diego Rapid Re Housing Program	70.5	Accepted	34	\$646,885	\$0	R	ARD	N/A
Turning Point	70	Accepted	35	\$177,096	\$0	R	ARD	N/A
Raymond's Refuge	70	Accepted	36	\$113,966	\$0	R	ARD	N/A
Forward	69	Accepted	37	\$632,152	\$0	R	ARD	N/A
S+C I Renewal	68.5	Accepted	43	\$399,355	\$0	R	ARD	N/A
Carlsbad PSH	65	Accepted	38	\$436,090	\$0	R	ARD	LTOY
S+C II Renewal	68	Accepted	44	\$386,666	\$0	R	ARD	Projects Ranked 44 or higher (Tier 2)
CoC Moving Home	64	Accepted	39	\$1,863,135	\$0	R	ARD	LTOY
East County Connection	62	Accepted	40	\$345,606	\$0	R	ARD	LTOY
High Needs Housing	62	Accepted	41	\$886,876	\$0	R	ARD	LTOY
SDHC Seniors	62	Accepted	42	\$743,356	\$0	R	ARD	LTOY
Hope Through Housing Foundation PSH	64.5	Accepted	46	\$250,000	\$0	R	ARD	PIP
HOME Now	67.5	Accepted	45	\$636,073	\$0	R	ARD	
Maternity Shelter Program	62	Accepted	48	\$308,019	\$0	R	ARD	PIP
DV Housing First Joint 2021 - CSI	53.5	Accepted	49	\$949,261	\$0	R	ARD	PIP
Joint Housing for Veterans	46.5	Accepted	50	\$216,176	\$0	R	ARD	PIP
Rachel's Rapid Rehousing	52	Fully Reallocated	Rejected	\$0	-\$177,883		ARD	
Women's Resource Center	0	Fully Reallocated	Not Ranked	\$0	-\$145,091		ARD	
City Carlsbad RRH Expansion	113	Accepted	51	\$504,715	322,974	N	Reallocated ARD / CoC Bonus	
Abbott St (PSH)	114	Accepted	52	\$150,000	\$0	N	CoC Bonus	
PATH Rapid Rehousing	100	Accepted	53	\$770,000	\$0	N	CoC Bonus	
Expanded Pathway to Housing - DV	93.5	Accepted	54	\$783,891	\$0	N	DV Bonus	
CRC DV Joint	93.5	Accepted	55	\$310,164	\$0	N	DV Bonus	
PRIZM Expansion (PSH)	75	Accepted	56	\$754,323	\$0	N	CoC Bonus	
Shared RRH	69	Accepted	57	\$429,740	\$0	N	CoC Bonus	
Moving Home Expansion	90	Accepted	58	\$1,982,137	\$0	N	CoC Bonus	
YHDP - CES		Accepted	Not Ranked	\$82,500	\$0	R	YHDP	
YHDP - HMIS		Accepted	Not Ranked	\$153,816	\$0	R	YHDP	

YHDP - Youth Navigation System		Accepted	Not Ranked	\$1,280,000	\$0	R	YHDP	
YHDP- Rapid Rehousing RRH		Accepted	Not Ranked	\$181,749	\$0	R	YHDP	
YHDP - TH-RRH Joint		Accepted	Not Ranked	\$2,234,279	\$0	R	YHDP	
YHDP - Host Homes		Accepted	Not Ranked	\$167,582	\$0	R	YHDP	

3A-1a. Housing Leverage Commitments

COVER

City of Carlsbad – RRH Expansion Project

PATH – RRH Project

City of Carlsbad – PSH Project

Wakeland – Abbott Street



***City of Carlsbad Housing Agency
PHA Commitment for Partnership***
2024 Continuum of Care Application

09/13/2024

The Carlsbad Housing Agency commits to partner with the Continuum of Care (CoC) by pairing rental assistance for a minimum of 10 households available through the agency's housing resources with CoC-funded supportive services to serve persons who are homeless, or at imminent risk of homelessness.

This commitment is applicable to the Carlsbad RRH Expansion project being submitted to the U.S. Department of Housing and Urban Development (HUD) for funding consideration under the 2024 CoC Notice of Funding Opportunity. The housing resources will be available during the operating period of the projects selected for funding, beginning July 1, 2025.

Currently the Carlsbad Housing Agency serves persons experiencing homelessness as defined by HUD through the Housing Choice Voucher Program with a homelessness preference, the Community Development Block Grant Program, the Continuum of Care Program, and the Homeless Services Division which funds a variety of programs and services. These provisions will apply to the projects selected for funding under the 2024 CoC Notice of Funding Opportunity.

In partnership on behalf of our community,

A handwritten signature in black ink that reads "Chris Shilling".

Chris Shilling
Homeless Services Manager
09/13/2024

September 9, 2024

U.S. Department of Housing & Urban Development
Office of Community Planning and Development
451 7th Street, S.W.
Washington, DC 20410

RE: Written Commitment for Leveraging Housing Resources to the PATH San Diego Rapid Re-Housing Program

To Whom it May Concern:

On behalf of the San Diego Housing Commission, I submit this letter indicating our commitment to PATH's San Diego Rapid Re-Housing program in response to the HUD Continuum of Care (CoC) FY2024 Notice of Funding Opportunity for CoC Bonus Funding. Housing subsidies for individuals experiencing homelessness within the city of San Diego is currently available to PATH through 8/31/2025. This contract includes an option to renew on an annual basis subject to SDHC approval and funding availability.

The San Diego Housing Commission commits to providing access to up to 35 Sponsor-Based Subsidies (SBS) for eligible program participants who are individuals experiencing homelessness in the City of San Diego co-enrolled with County Behavioral Health Services (BHS). There is already an existing contract with PATH for the 35 SBS vouchers and access to SBSs will be available through attrition and for any unused SBS's to participants who qualify under the existing SBS guidelines and choose the support. The San Diego Housing Commission will maintain eligibility criteria for the committed housing subsidies that is no more restrictive than what is required by federal regulations and the existing SBS guidelines.

The total estimated value of the existing SBS Contract is \$ \$657,586 on an annual basis. The total contribution of housing leverage is based upon the following commitment of SBSs to the program:

- Up to 35 SBS vouchers, will be made available for this CoC-funded RRH project for the duration of the SBS contract term.
- Allow direct referrals from PATH to the County of San Diego's Behavioral Health Services for validation and referral of SBS's for eligible households.
- PATH will provide the administrative support and partner with County of San Diego Behavioral Health Services to provide the supportive services and treatment to homeless individuals in the City of San Diego.

The San Diego Housing Commission and PATH have confirmed the value of the housing subsidies provided is consistent with the average housing assistance payments for the sponsor based subsidy program within the city of San Diego. We affirm that the source of the funds provided by the San Diego Housing Commission are from a non-CoC or ESG funding source. PATH will keep and make available for inspection records documenting this contribution as required by HUD.



SAN DIEGO
HOUSING
COMMISSION

Rental Assistance Division

The San Diego Housing Commission looks forward to leveraging the existing SBS contract for housing resources to help people experiencing homelessness achieve housing stability. This agreement is effective only upon selection of the named project for funding. The signature below is a representative of the San Diego Housing Commission authorized to make the type of commitments identified in this letter. If you have any questions, please do not hesitate to contact me at Azucenav@sdhc.org or 619-578-7604

Sincerely,

Azucena Valladolid

Azucena Valladolid

Executive Vice President of Rental Assistance and Workforce Development



09/13/2024

Regional Task Force on Homelessness

4699 Murphy Canyon Rd

Suite 106

San Diego, CA 92123

Written Commitment for Housing Support

The City of Carlsbad is committed to assisting the CoC in meeting the needs of homeless persons by providing the following housing resources for persons experiencing homelessness or fleeing domestic violence:

Housing Resources Description

A minimum of 21 Tenant-Based Housing Subsidies (Housing Choice Vouchers)

Eligibility Statement

The commitment of housing is to the City of Carlsbad, Carlsbad PSH project beginning on or before July 1, 2025. In addition to the above understanding, the City of Carlsbad confirms that the eligibility criteria for our services will comply with the HUD program and fair housing rules, and we will not further restrict access to services through additional eligibility requirements.

Value of Resources

These resources will be available to project participants beginning on or before July 1, 2025. The value of the resources is \$604,800 per year as estimated on the following housing value: 21 subsidies valued at an average of \$28,800 each per year.

Basis of Estimated Value

The value of the resources is based on the allowable voucher amount for a 1-bedroom unit.

Concluding Statement

This agreement is effective only upon selection of the named project for funding. The signature below is a representative of the City of Carlsbad authorized to make the type of commitments identified in this letter.

A handwritten signature in cursive script that reads 'Chris Shilling'.

Chris Shilling

Homeless Services Manager

Housing & Homeless Services



October 14, 2024

RE: CoC NOFA Match Documentation

The Abbott Street Apartments will provide a capital **housing leverage** in the amount of \$6,830,000. The capital funding is from the City of San Diego in the amount of \$1,465,000, County of San Diego in the amount of \$1,465,000, and the State of California Homekey Program in the amount of \$3,900,000.

Sincerely,

Tricia Tasto Levien

Tricia Tasto Levien
VP of Operations

NOTE: The project has other documentation for the 25% match commitment. This letter documents the the HOUSING LEVERAGE for the project. As seen in the signed agreement, the leverage amount supports all 13 units of the project. 100% housing leverage.



EXECUTIVE SUMMARY

MEETING DATE: November 20, 2023

HCR23-128

SUBJECT: Authorization to Accept \$3,900,000 in State of California (State) Homekey Program Funds; to Amend the San Diego Housing Commission's Fiscal Year 2024 Budget in the Amount of \$3,900,000; to Expend \$3,900,000 in State Homekey Program Funds to Support the Proposed Acquisition and Development of Abbott Street Apartments; and to Amend and Restate or Terminate Previous Affordability Restrictions Recorded on the Property

COUNCIL DISTRICT: 2

ORIGINATING DEPARTMENT: Real Estate

CONTACT/PHONE NUMBER: Emily S. Jacobs (619) 578-7423

REQUESTED ACTION:

Authorize the San Diego Housing Commission (Housing Commission) to accept \$3,900,000 in State of California (State) Homekey Program Funds, to amend the Housing Commission's Fiscal Year 2024 budget in the amount of \$3,900,000 and grant authority to expend \$3,900,000 in State Homekey Program funds to support the proposed development of Abbott Street Apartments at 2147 Abbott Street, San Diego, CA 92107 in Council District 2, which will consist of 13 affordable rental housing units for people experiencing chronic homelessness with income up to 30 percent of San Diego's Area Median Income. Also authorize the Housing Commission to amend and restate or terminate previous affordability restrictions recorded on the property.

EXECUTIVE SUMMARY OF KEY FACTORS:

- The Housing Commission and Wakeland Abbott LLC submitted a joint application to the State Department of Housing and Community Development (Department) for grant funds in the amount of \$3,900,000 (Homekey Grant) to partially finance Abbott Street Apartments. The Department accepted the application and awarded the request funds.
- The Abbott Street Apartments development consists of 13 affordable rental housing units for people experiencing chronic homelessness with income up to 30 percent of San Diego's Area Median Income (AMI), currently \$28,950 per year for a one-person household.
- Through a Memorandum of Agreement (MOA) with the County of San Diego Health and Human Services Agency, residents will receive supportive services to support housing stabilization, enhance quality of life, and make connections to community resources,
- The Housing Commission has committed 13 federal Project-Based Housing Vouchers to help pay rent for residents experiencing homelessness.
- The proposed development would eliminate and replace prior Housing Commission affordability restrictions and would consist of 13 affordable rental housing units for households experiencing chronic homelessness with income up to 30 percent of AMI and one office/service space.
- Wakeland Abbott LLC conducted extensive due diligence activities, and a third-party review of the resulting reports revealed no findings that would prevent the recommendation for the Housing Commission to collaborate with Wakeland Abbott LLC on this property.
- On May 12, 2023, the Housing Commission Board voted 4-0 to authorize the Housing Commission to submit the joint application to the Department for grant funds in an amount not to exceed \$5,000,000.
- The estimated total cost for Wakeland Abbott LLC's acquisition and rehabilitation of the property is \$6,830,000 (\$525,385/unit).



REPORT

DATE ISSUED: November 14, 2023

REPORT NO: HCR23-128

ATTENTION: Chair and Members of the San Diego Housing Commission
For the Agenda of November 20, 2023

SUBJECT: Authorization to Accept \$3,900,000 in State of California (State) Homekey Program Funds; to Amend the San Diego Housing Commission's Fiscal Year 2024 Budget in the Amount of \$3,900,000; to Expend \$3,900,000 in State Homekey Program Funds to Support the Proposed Acquisition and Development of Abbott Street Apartments; and to Amend and Restate or Terminate Previous Affordability Restrictions Recorded on the Property

COUNCIL DISTRICT: 2

REQUESTED ACTION

Authorize the San Diego Housing Commission (Housing Commission) to accept \$3,900,000 in State of California (State) Homekey Program Funds, to amend the Housing Commission's Fiscal Year 2024 budget in the amount of \$3,900,000 and grant authority to expend \$3,900,000 in State Homekey Program funds to support the proposed development of Abbott Street Apartments at 2147 Abbott Street, San Diego, CA 92107 in Council District 2, which will consist of 13 affordable rental housing units for people experiencing chronic homelessness with income up to 30 percent of San Diego's Area Median Income. Also authorize the Housing Commission to amend and restate or terminate previous affordability restrictions recorded on the property.

STAFF RECOMMENDATION

That the San Diego Housing Commission (Housing Commission) Board of Commissioners (Board) recommend that the Housing Authority of the City of San Diego (Housing Authority) take the following actions:

- 1) Authorize the Housing Commission (Housing Commission) to amend its Fiscal Year 2024 budget in the amount of \$3,900,000 in State of California (State) Homekey Program funds to support the proposed development of Abbott Street Apartments at 2147 Abbott Street, San Diego, CA 92107 in Council District 2, which will consist of 13 affordable rental housing units for people experiencing chronic homelessness with income up to 30 percent of San Diego's Area Median Income.
- 2) Authorize the Housing Commission to accept and expend \$3,900,000 in State Homekey Program funds to support the proposed development of Abbott Street Apartments at 2147 Abbott Street, San Diego, CA 92107 in Council District 2, which will consist of 13 affordable rental housing units for people experiencing chronic homelessness with income up to 30 percent of San Diego's Area Median Income.

November 14, 2023

Authorization to Accept and Expend State Homekey Funds for the Proposed Abbott Street Apartments Development

Page 2

- 3) Authorize the Housing Commission's President and Chief Executive Officer (President & CEO), or designee, to amend and restate the Housing Commission's existing restrictions and deed of trust on the Property, so that such restated or replacement restrictions comport to the transaction described in this report.
- 4) Authorize the Housing Commission's President and Chief Executive Officer (President & CEO), or designee, to execute all documents and instruments that are necessary and/or appropriate to implement these approvals, in a form approved by General Counsel, and to take such actions as are necessary and/or appropriate to implement these approvals. Housing Commission staff will notify the Housing Authority and the City Attorney's Office about any subsequent amendments or modifications to the documents, and other required documents, including amendments to any documents.

SUMMARY

The State Department of Housing and Community Development (Department) issued a Notice of Funding Availability (NOFA), dated March 29, 2023, for the Homekey Program, which continues a statewide effort to sustain and rapidly expand housing for persons experiencing homelessness or at risk of homelessness, and who are, thereby, disproportionately impacted by and at increased risk for medical diseases or conditions due to the COVID-19 pandemic or other communicable diseases. The Department issued the NOFA for Homekey Program grant funds pursuant to Assembly Bill 140 (2021-2022 Regular Session), which provided the statutory basis for Round 3 of the Homekey Program by adding section 50675.1.3 to the California Health and Safety Code.

Through the Homekey Program, the Department is making \$736 million in grant funding available to local public entities, including cities, counties or other local public entities, including housing authorities or federally recognized tribal governments within California. Awarded funds may be used for acquisition or rehabilitation of hotels, apartments, or homes, including manufactured housing, to be converted into permanent or interim housing; conversion of nonresidential properties into residential units; new construction; master leasing of properties for non-congregate housing; purchase of affordability covenants and restrictions for units; relocation costs for individuals being displaced as a result of the Homekey Program project; and capitalized operating subsidies for units purchased, converted, constructed or altered.

The Housing Commission and Wakeland Abbott LLC submitted a joint application to the Department for grant funds in the amount of \$3,900,000 (Homekey Grant) to partially finance Abbott Street Apartments. The Department accepted the application and awarded the request funds.

The Abbott Street Apartments development consists of 13 affordable rental housing units for people experiencing chronic homelessness with income up to 30 percent of San Diego's Area Median Income (AMI), currently \$28,950 per year for a one-person household. It will be constructed and operated in accordance with all applicable laws, rules, regulations and conditions of the Homekey Program, the Standard Agreement, and Project-Based Vouchers (PBV) regulations the Housing Commission has committed to the development. The Department restricts the occupancy and rents of 13 dwelling units in the development as affordable to persons with incomes at or below 30 percent of AMI.

The joint application by the Housing Commission and Wakeland Abbott LLC supports the acquisition and rehabilitation of a currently vacant, multifamily housing property at 2147 Abbott Street, San Diego, CA 92107, in Council District 2. In 1997, the Housing Commission restricted the then 14 units at the

November 14, 2023

Authorization to Accept and Expend State Homekey Funds for the Proposed Abbott Street Apartments Development

Page 3

property to persons with income at or below 80 percent of AMI. The Housing Commission subsequently allowed the property to be reconfigured to provide 10 transitional housing units for victims of domestic violence, with nine units restricted at or below 35 percent of AMI and one unit restricted at or below 50 percent of AMI. The foregoing restrictions further provided that if the property is no longer utilized as transitional housing, the restrictions would revert to 14 units at 80 percent of AMI. The proposed development would eliminate and replace the prior Housing Commission affordability restrictions and would consist of 13 affordable rental housing units for households experiencing chronic homelessness with income up to 30 percent of AMI and one office/service space. The Housing Commission has committed 13 PSH PBVs to help residents pay their rent. Residents would be identified through referrals from the Coordinated Entry System and would include individuals experiencing chronic homelessness. Residents would receive supportive services to support housing stabilization, enhance quality of life and make connections to community resources, including but not limited to, primary health needs, mental and behavioral health needs and other community-based programs to best meet a resident's individual needs.

The County of San Diego has committed \$1,465,000 in one-time capital funds from the County American Rescue Plan Act (ARPA) funds and \$1,661,485 in services funds from the County General Purpose Fund (GPR). Through a Memorandum of Agreement (MOA) with the County of San Diego Health and Human Services Agency, residents will receive supportive services to support housing stabilization, enhance quality of life, and make connections to community resources, including but not limited to, primary health needs, mental and behavioral health needs, and other community-based programs to best meet a resident's individual needs.

The City of San Diego plans to provide the project with a total of \$1,465,000 in HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) funds.

The development aligns with the goals of the Community Action Plan on Homelessness for the City of San Diego to increase access to permanent housing solutions for people experiencing homelessness and increase access to services for people with behavioral health needs.

PREVAILING WAGES

Per Section 506 of the NOFA, the use of Homekey funds is subject to California's prevailing wage law (Lab. Code, § 1720 et seq.) and Wakeland Abbott LLC submitted a certification of compliance with the Homekey application. Further, any contract executed requiring payment of prevailing wages for this project shall include applicable clauses and require contractors to sign and submit the prevailing wage documents prior to the start of work. The payment of prevailing wages has been included in the project budget. The developer proposes to use 13 PSH PBVs, administered by the Housing Commission, which will require the payment of federal Davis-Bacon and Related Acts prevailing wages. The higher of the federal or state prevailing wages will apply.

AFFORDABLE HOUSING IMPACT

The Housing Commission has provided a preliminary award recommendation of 13 PSH PBVs for Abbott Street Apartments for households experiencing chronic homelessness with income up to 30 percent of AMI. Residents will be identified through referrals from the Coordinated Entry System and would include individuals experiencing chronic homelessness. Under the PBV program, the tenant's rent portion is determined by using the applicable minimum rent or a calculated amount based on their income level, whichever is higher, with the remainder being federally subsidized up to a gross rent level

November 14, 2023

Authorization to Accept and Expend State Homekey Funds for the Proposed Abbott Street Apartments Development

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approved by the Housing Commission. The Housing Assistance Payment provides a rental subsidy for residents of Abbott Street Apartments' 13 voucher-assisted units.

FISCAL CONSIDERATIONS

Homekey Program funds awarded to the Housing Commission were not included in the Housing Commission's Fiscal Year 2024 Housing Authority-approved budget. Approval of this action will increase Fiscal Year 2024 funding sources and uses available by \$3,900,000 to support the proposed acquisition and rehabilitation of 13 affordable rental housing units for people experiencing chronic homelessness.

PREVIOUS HOUSING COMMISSION BOARD OF COMMISSIONERS ACTIONS

On May 12, 2023, the Housing Commission Board voted 4-0 to authorize the Housing Commission to submit a joint application with the County of San Diego to the State of California Department of Housing and Community Development (Department) Homekey Program for grant funds in an amount not to exceed \$5,000,000 in accordance with the March 29, 2023, NOFA for the Homekey Program. The Housing Commission was further authorized to join Wakeland Housing and Development Corporation in entering into, executing and delivering a Standard Agreement with the Department in a total amount not to exceed \$5,000,000 if the grant application was approved and if the Housing Authority subsequently approves the project. (Resolution No. HC-1986).

DUE DILIGENCE

Leading up to the May 12, 2023, Housing Commission Board action and in preparation for the joint application for Homekey funds, Wakeland Abbott LLC conducted extensive due diligence activities as outlined below, and a third-party review of the resulting reports revealed no findings that would prevent the recommendation for the Housing Commission to collaborate with Wakeland Abbott LLC on this property.

- Appraisal dated May 9, 2023. Kinetic Valuation Group, Inc. completed an appraisal of the property's fee simple interest. The market value fee simple interest as existing use is indicated as \$4,700,000 (\$361,538 per unit). This value is higher than the purchase price of \$4,500,000. In addition to the appraisal, the Housing Commission enlisted BTI appraisal to complete a peer review of the KVG appraisal, and the County of San Diego Department of General Services Real Estate Valuation completed an appraisal review. The BTI peer review found the KVG appraisal acceptable, and the County of San Diego review found that the appraisal complied with the Uniform Standards of Professional Appraisal Practice and that the appraiser's analysis of the selected market data were appropriate and produced reasonable results. A copy of the appraisal is attached.
- Physical Needs Assessment dated February 24, 2023, performed by PACS, Inc., to observe and document readily visible building components, existing improvements, materials, and building system defects, which might significantly affect the value of the subject property and determine if conditions exist which may have a significant impact on the continued operation of the facility during the evaluation period. A report has been prepared by PACS, Inc. that summarizes the remaining useful life of the building's components, the existing conditions of the property, the immediate and long-term repairs needed, and estimates for the cost of repairs. The planned rehabilitation of the property will address the items identified in the Physical Needs Assessment.

- Hazardous Materials report dated May 22, 2023, performed by Leighton and Associates, Inc. and Vista Environmental Consulting to identify and sample accessible, suspect asbestos-containing materials (ACMs), asbestos-containing construction materials (ACCMs), representative building components for the presence of lead-based paints (LBPs)/lead-bearing substances (LBSs), Suspect lead-containing surface coatings (LCSCs), universal waste (UW) materials, polychlorinated biphenyls (PCBs) containing devices, mechanical equipment & machines which contain ozone depleting chemicals, devices with low-level radioactive sources, and other universal waste materials that may be present within the facility. The report indicated that ACMs, LBP/LBS/LCSCs, and UW materials are present at the Property. The remediation of these hazardous materials has been included in the scope of work for the renovation and the cost to remediate has been included in the renovation budget.
- Phase I Environmental Site Assessment dated February 17, 2023, was performed by Leighton and Associates, Inc. to determine if any recognized environmental conditions (REC) were present as a result of current or historical land uses. The assessment included public environmental agency and historical record reviews, interviews, site observations, and report preparation. The assessment revealed no evidence of current, historical, or controlled REC's, and no need for additional environmental investigation.
- Market Study dated May 8, 2023, prepared by Kinetic Valuation Group, Inc. indicated that the Project addresses two major needs in the San Diego County region: the need for an increased supply of affordable housing and housing that is specifically designed to address homelessness. Additionally, the report indicated that there are no apparent weaknesses with the Project development scheme, rents, or market.
- Zoning Conformance Verification. As part of the Homekey application, the City of San Diego's Development Services Department verified that this project is in conformance with applicable codes.
- Title Report dated January 6, 2023, from Stewart Title Guaranty Company revealed no adverse findings.
- Third-Party Due Diligence Review dated February 17, 2023, conducted by LeSar Development Consultants, stated that all facts were consistent between the due diligence reports, relevant risks had been addressed, and that proposed rents were in line with the Project's Enterprise Community location pursuant to SDHC's Choice Communities Initiative.

PROJECT FINANCING

SOURCES	Cost	Per Unit
Local Match Funding - City of San Diego	\$1,465,000	\$112,692
Local Match Funding - County of San Diego	\$1,465,000	\$112,692
Homekey - Capital	\$3,900,000	\$300,000
Total Project Sources	\$6,830,000	\$525,385

November 14, 2023

Authorization to Accept and Expend State Homekey Funds for the Proposed Abbott Street Apartments Development

Page 6

USES	Cost	Per Unit
Land/Acquisition	\$4,510,000	\$346,923
Design & Engineering	\$136,440	\$10,495
Legal/Financial/Other Consultants	\$25,000	\$1,923
Permits & Fees	\$35,000	\$2,692
Direct Building Construction	\$1,167,800	\$89,831
Financing Costs	\$163,046	\$12,542
Marketing/General & Administrative	\$124,000	\$9,538
Developer Fees	\$416,000	\$32,000
Hard Cost Contingency	\$154,514	\$11,886
Soft Cost Contingency	\$98,201	\$7,554
Total Project Uses	\$6,830,000	\$525,385

HOUSING COMMISSION STRATEGIC PLAN

This item relates to Strategic Priority Area No. 1 and No.4 in the Housing Commission Strategic Plan for Fiscal Year (FY) 2022-2024. No.1: Increasing and Preserving Housing Solutions. No.4: Advancing Homelessness Solutions – Supporting the City of San Diego Community Action Plan on Homelessness.

EQUAL OPPORTUNITY CONTRACTING AND EQUITY ASSURANCE

The Housing Commission and Wakeland Housing have developed a comprehensive Racial Disparity Analysis and Community Engagement plan in accordance with the Homekey Program application requirements.

KEY STAKEHOLDERS and PROJECTED IMPACTS

This funding opportunity would benefit individuals and families experiencing homelessness in the City of San Diego who are disproportionately impacted by and at increased risk for medical diseases or conditions due to the COVID-19 pandemic or other communicable diseases.

ENVIRONMENTAL REVIEW

On May 2, 2023 the City of San Diego conducted an environmental review and determined the project is exempt from CEQA pursuant to CEQA Guidelines Section 15301 (d) (Existing Facilities), 15302 (c) (Replacement or Reconstruction), and 15304 (Minor Alterations to Land). This activity is exempt pursuant to CEQA Guidelines Section 15301 (d) (Existing Facilities), as there are no changes planned to the building footprint or property use and it will restore or rehabilitate the facility to meet current standards of public health and safety. The activity is also exempt pursuant to CEQA Guidelines Section 15302 (c) (Replacement or Reconstruction), which consists of the replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity, and CEQA Guidelines Section 15304 (Minor Alterations to Land) that consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees. None of the exceptions to the exemptions outlined in CEQA Guidelines Section 15300.2 would apply as no cumulative impacts were identified, no significant effects on the environment were

identified the project is not adjacent to a scenic highway, and no historical resources would be affected by the action.

2147 Abbott St. Ocean Beach Homekey	48	49	50	51
PROJECT CASH FLOW				
Federal funds constitute a portion of the project's funding. A determination that the project is categorically excluded subject to Section 58.5 of the National Environmental Policy Act was approved by the City of San Diego on May 8, 2023.				

Respectfully submitted,

Approved by,



Josh Hoffman
Vice President, Real Estate Development Services
Real Estate Division



Jeff Davis
Interim President & CEO
San Diego Housing Commission

Attachments:

- 1) Pro forma
- 2) Appraisal
- 3) Homekey Award Letter
- 4) Housing Commission Board Resolution HC-1986

Hard copies are available for review during business hours at the information desk in the main lobby of the San Diego Housing Commission offices at 1122 Broadway, San Diego, CA 92101 Docket materials are also available in the “Governance & Legislative Affairs” section of the San Diego Housing Commission website at www.sdhc.org.

Units for Rent	13
Manager's Units	0
Total Units	13

3A-1a. Healthcare Agreement Commitments

COVER

PATH – RRH Project – Blue Cross

PATH - PSH Project – Family Healthcare Center

City Carlsbad – Exodus Services



September 9, 2024

U.S. Department of Housing & Urban Development
Office of Community Planning and Development
451 7th Street, S.W.
Washington, DC 20410

RE: Written Commitment for Healthcare Services to the PATH San Diego Rapid Re-Housing Program

To Whom it May Concern:

Through California Advancing and Innovating Medi-Cal (CalAIM), Blue Shield of California Promise Health Plan (BSCPHP) members have access to new and improved services that address physical, social, and mental health needs such as Community Supports. Community Supports are services provided by Medi-Cal managed care plans (MCPs) to address Medi-Cal members’ health-related social needs, help them live healthier lives, and avoid higher, costlier levels of care. BSCPHP members may receive a Community Supports service if they meet the eligibility criteria, and if the Community Supports service is a medically appropriate and cost-effective alternative to services covered under the California Medicaid State Plan.

PATH is contracted with Blue Shield of California Promise Health Plan to provide the below five (5) Community Supports.

Housing Deposits	Members receive assistance with housing security deposits, utilities set-up fees, first and last month’s rent, and first month of utilities. Members can also receive funding for medically-necessary items like air conditioners, heaters, and hospital beds to ensure their new home is safe for move-in.
Housing Tenancy and Sustaining Services	Members receive support to maintain safe and stable tenancy once housing is secured, such as coordination with landlords to address issues, assistance with the annual housing recertification process, and linkage to community resources to prevent eviction.
Housing Transition	Members experiencing homelessness or at risk of experiencing homelessness receive help to find, apply for, and secure housing.



Promise Health Plan

Navigation Services	
Recuperative Care	Members with unstable housing who no longer require hospitalization, but still need to heal from an injury or illness, receive short-term residential care. The residential care includes housing, meals, ongoing monitoring of the member's condition, and other services like coordination of transportation to appointments.
Short Term Post Hospitalization Housing	Members who do not have a residence, and who have high medical or mental health and substance use disorder needs, receive short-term housing for up to six months to continue their recovery. To receive this support, members must also have been discharged from an inpatient clinical setting, residential substance use disorder treatment or recovery facility, residential mental health treatment facility, correctional facility, nursing facility, or recuperative care.

Applicable services will be available to all those who are eligible in the PATH San Diego Rapid Re-Housing program.

Per the rates in our contract, PATH is compensated by BSCPHP for the provision of Community Supports services. We affirm that the source of the funds paid by BSCPHP are from a non-CoC or ESG funding source. PATH will keep and make available for inspection records documenting this contribution as required by HUD.

BSCPHP looks forward to continuing to leverage these services to help people experiencing homelessness achieve housing and health stability. The signature below is a representative of Blue Shield Promise authorized to confirm the information provided in this letter. If you have any questions, please do not hesitate to contact me at Susan.Mahonga@blueshieldca.com

Sincerely,

Signed by:

 5DFD1A6436DC471...

Susan Mahonga
 Director, CalAIM



FAMILY HEALTH CENTERS
OF SAN DIEGO

Family Health Centers of San Diego

823 Gateway Center Way, San Diego CA 92102

P: (619) 515-2300 F: (619) 237-1856 FHCSO.org

"Exceptional in Every Way"

September 9, 2024

Beach Area
Family Health
Center

Chase Avenue
Family Health
Center

Chula Vista
Family Health
Center

City Heights
Family Health
Center

Diamond
Neighborhoods
Family Health
Center

Downtown
Family Health
Center at
Connections

El Cajon
Family Health
Center

Elm Street
Family Health
Center

FamilyHealth
on Commercial

Grossmont
Spring Valley
Family Health
Center

Hillcrest
Family Health
Center

Ibarra
Family Health
Center

Lemon Grove
Family Health
Center

Logan Heights
Family Health
Center

Mobile
Medical Units

National City
Family Health
Center

North Park
Family Health
Center

Oak Park
Family Health
Center

Rice
Family Health
Center

Sherman Heights
Family Health
Center

U.S. Department of Housing & Urban Development
Office of Community Planning and Development
451 7th Street, S.W.
Washington, DC 20410

RE: Written Commitment for Healthcare Services to PATH San Diego Connections
Housing

To Whom It May Concern:

Family Health Centers of San Diego (FHCSO) commits to providing healthcare services to the PATH San Diego Connections Housing PSH program. Our healthcare services will be available through the grant term (i.e., 12/1/2025-11/30/2026) and tailored to participants in the project who qualify and choose to receive healthcare services. FHCSO will not require any additional eligibility requirements.

The total contribution of these healthcare services is **\$382,070**. The estimated total contribution of healthcare services is based upon the following provision of services:

- Medical care to acute and chronic health issues, including treatment for HCV and HIV. Annual services estimates are 372 visits at a rate of \$261.08 = total of \$97,122
- Mental health services, including counseling and psychiatric services. Annual services estimates are 720 visits at a rate of \$261.08 = total of \$187,978;
- Substance Use Disorder (SUD) Treatment, including individual SUD Counseling, outpatient treatment program and Medication Assisted Treatment; Annual services estimates are 300 visits at a rate of \$261.08 = total of \$78,324;
- Patient Navigation and support services, including peer support services and intensive case management to ensure initial and continued engagement in care. Annual services estimates are 240 visits at a rate of 55.39 = total of \$13,294; and
- Benefit enrollment support, including eligibility screening and enrollment support for an array of benefit programs, including Medi-Cal, Medi-Care, and SNAP. Annual services estimates are 120 visits at a rate of \$44.60 = total of \$5,352





FAMILY HEALTH CENTERS
OF SAN DIEGO

Family Health Centers of San Diego

823 Gateway Center Way, San Diego CA 92102

P: (619) 515-2300 F: (619) 237-1856 FHCSD.org

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Neighborhoods
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Downtown
Family Health
Center at
Connections

El Cajon
Family Health
Center

Elm Street
Family Health
Center

FamilyHealth
on Commercial

Grossmont
Spring Valley
Family Health
Center

Hillcrest
Family Health
Center

Ibarra
Family Health
Center

Lemon Grove
Family Health
Center

Logan Heights
Family Health
Center

Mobile
Medical Units

National City
Family Health
Center

North Park
Family Health
Center

Oak Park
Family Health
Center

Rice
Family Health
Center

Sherman Heights
Family Health
Center

FHCSD and PATH have confirmed the value of the healthcare services provided is consistent with the local rates and the amount paid for services in our community. We affirm that the source of the funds provided by the FHCSD are from a non-CoC or ESG funding source. PATH will keep and make available for inspection records documenting this contribution as required by HUD.

FHCSD looks forward to leveraging our services to help people experiencing homelessness achieve housing and health stability. This agreement is effective only upon selection of the named project for funding. The signature below is a representative of FHCSD authorized to make the type of commitments identified in this letter. If you have any questions, please do not hesitate to contact me at robertl@fhcsd.org or (619) 515-2563.

Sincerely,

Robert Lewis
Sr. Director of Development





September 9, 2024

U.S. Department of Housing & Urban Development
Office of Community Planning and Development
451 7th Street, S.W.
Washington, DC 20410

RE: Written Commitment for Leveraging Housing Resources to the PATH Connections Housing PSH Program

To Whom It May Concern:

On behalf of Affirmed Housing, I submit this letter indicating our commitment to PATH's San Diego Connections Housing PSH program in response to the HUD Continuum of Care (CoC) FY2024 Notice of Funding Opportunity for renewal funding. Housing support will be available through the grant term (i.e., 12/1/2025-11/30/2026).

Affirmed Housing has a Project Based Voucher Housing Assistance Payment (HAP) Contract with The San Diego Housing Commission at Connections Housing. Access to the voucher program will be available to all participants who qualify, choose the support, and eligibility criteria will be no more restrictive than what is required by federal regulations. The total annual estimated value of these subsidies is \$1,201,384.80 based upon 66 project-based vouchers.

The value of the housing subsidies provided is consistent with the local rates and the amount paid for services in our community. We affirm that the source of the funds is from a non-CoC or ESG funding source. PATH will keep and make available for inspection records documenting this contribution as required by HUD.

Affirmed Housing looks forward to leveraging our resources to help people experiencing homelessness achieve housing stability. This agreement is effective only upon selection of the named project for funding. The signature below is a representative of Affirmed Housing authorized to make the type of commitments identified in this letter. If you have any questions, please do not hesitate to contact me at jaime@affirmedhousing.com or 858-762-9050

Sincerely,

Jaime Albarelli
Supportive Housing Director