



Summary of Revisions to FY2019-20 Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

Reason for the Change to 1.4.B(3)

The 5-Year Mainstream Program is being updated and will be a program that is subject to MTW policies. The below language reflects the program change from non-MTW to MTW.

1.4.B Moving to Work Agreement and Activities

- (1) SAHA's MTW authorizations and administrative responsibilities are provided in the Amended and Restated Moving to Work Agreement entered into on June 25, 2009, by and between the HUD and SAHA. Pursuant to the Agreement, SAHA will include any new MTW initiatives in an Annual MTW Plan and have the Plan approved by HUD prior to implementation. SAHA will also prepare Annual MTW Reports, which will compare the performance of SAHA's activities with its Annual MTW Plan.
- (2) SAHA's implemented MTW activities are incorporated in each applicable section of this Administrative Plan. A complete list of MTW activities is provided in Exhibit 1-1.
- (3) The MTW activities apply only to certain assisted housing programs administered by SAHA. All non-MTW programs are subject to normal program rules and regulations.
 - (a) SAHA's MTW programs include:
 - (i) HCV Program
 - (ii) Set Aside Homeless Voucher Program (SHVP)
 - (iii) Homeless Services Voucher (HSV) Program
 - (iv) 5-Year Mainstream Program
 - (b) SAHA's non-MTW programs include:
 - (i) Continuum of Care (CoC) Program
 - (ii) Veterans Affairs Supportive Housing (VASH) Program



~~(iii) 5-Year Mainstream Program~~

(iv) Moderate-Rehabilitation (MOD) Program

Reason for the Change to 3.3.D(2) and 3.3.E

Language in this section has been re-written to allow eligibility screening that applies different look-back periods based on the severity of crimes, opposed to previous policy where the look-back period for all criminal activity was five (5) years. This new policy outlines three different look-back periods: three years for less severe crimes, five years, and seven years for the most severe crimes.

3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

(2) Criminal Activity [24 CFR 982.553]

(a) HUD permits, but does not require, SAHA to deny assistance if it determines that any household member is currently engaged in, or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.

~~(b) If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past five years, the family will be denied assistance:~~

~~(i) Drug-related criminal activity, defined by HUD as 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 [24 CFR 5.100].~~

~~(ii) Violent criminal activity, defined by HUD as 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 [24 CFR 5.100].~~

~~(iii) Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity (within a three-block radius); or~~

~~(iv) Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of~~



- ~~SAHA (including a SAHA employee or a SAHA contractor, subcontractor, or agent):~~
- ~~(e) Evidence of such criminal activity includes, but is not limited to:~~
- ~~(i) An arrest within the past five (5) years for drug-related or violent criminal activity that resulted in conviction.~~
 - ~~(ii) A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying criminal activity.~~
 - ~~(iii) Any record of eviction from public or privately owned housing as a result of criminal activity within the past five (5) years.~~
 - ~~(iv) A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity.~~
- (d) In making its decision to deny assistance, SAHA will consider the factors discussed in Section 3.3.F. Upon consideration of such factors, SAHA may, on a case-by-case basis, decide not to deny assistance.

3.3.E SAHA CRIMINAL HISTORY SCREENING POLICY

- (1) SAHA will conduct a criminal background check for every adult household member in an applicant's household.
- (2) In accordance with HUD regulations, SAHA will deny assistance to any household member with a lifetime registration requirement under a state sex offender registration program.
- (3) In accordance with HUD regulations, SAHA will deny assistance to any household member who has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.
- (4) If any household member is currently engaged in, or has engaged in, any criminal activities during the designated look-back periods as presented in the SAHA Screening Criteria Grid below, the family will be denied admission.
- (5) The look-back periods in the Screening Criteria Grid apply from the date of conviction to the date of the screening.



- (6) The Screening Criteria Grid generally applies to convictions. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying criminal activity.
- (7) If an expunged conviction appears on a criminal background report, it will not be considered in the screening process.
- (8) Attempts and conspiracies to commit a crime will be treated the same way as the primary crime. For example, an applicant with a conviction for attempted murder will be screened the same way as a person with a conviction for murder.

SAHA Screening Criteria Grid

<u>Offense Category</u>	<u>Within seven (7) years of conviction</u>	<u>Within five (5) years of conviction</u>	<u>Within three (3) years of conviction</u>
<u>Violent Criminal Activity</u>	<ul style="list-style-type: none"> ● <u>1st Degree / 2nd Degree Homicide</u> ● <u>Manslaughter / Criminally Negligent Homicide</u> ● <u>Assault / Battery</u> ● <u>Robbery (All Types), including Aggravated Robbery</u> ● <u>1st Degree Felony Injury to an Elderly or Disabled Individual</u> ● <u>Sexual Assault / Sex Offenses</u> ● <u>Deadly Conduct</u> ● <u>Weapons Offense (Against Person)</u> ● <u>Kidnapping, Abduction, and Unlawful Restraint</u> ● <u>Family Violence/Domestic Violence</u> 	<ul style="list-style-type: none"> ● <u>Stalking</u> ● <u>Harassment</u> ● <u>Crimes involving Terrorism / Terroristic Threat</u> 	<ul style="list-style-type: none"> ● <u>Assault by Contact</u> ● <u>Crimes against Animals</u>



<p><u>Drug-Related Criminal Activity</u></p>	<ul style="list-style-type: none"> • <u>Drug Offense (Manufacture, Distribution, or Possession with Intent to Distribute)</u> 	<ul style="list-style-type: none"> • <u>Driving under the Influence - If two (2) or more convictions</u> • <u>Drug Offense (Possession) - If two (2) or more felony convictions</u> 	<ul style="list-style-type: none"> • <u>Driving under the Influence, or other Alcohol-Related Conviction</u> • <u>Drug Offense (Possession) - Misdemeanor</u> • <u>Currently using Drugs / History of</u>
<p><u>Other*</u></p>	<ul style="list-style-type: none"> • <u>Arson-related</u> • <u>Human Trafficking</u> 	<ul style="list-style-type: none"> • <u>Fraud</u> • <u>Burglary/Breaking and Entering (Felony Only)</u> • <u>Criminal Mischief / Damage / Property Vandalism (Felony Only)</u> • <u>Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions)</u> 	<ul style="list-style-type: none"> • <u>Trespassing</u> • <u>Theft/Stolen Property (if 2 convictions or more)</u> • <u>Weapons-related (other than use of weapons against person)</u> • <u>Disturbance of the Peace / Public Lewdness</u> • <u>Prostitution (Felony Only)</u> • <u>Solicitation</u> • <u>Destruction of Property</u> • <u>Misdemeanor Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions)</u>

*Other is defined as the following:

- Criminal Activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity (within a three-block radius); and
- Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of SAHA (including a SAHA employee or a SAHA contractor, subcontractor, or agent).



Reason for the Change to 4.2.C

This section has been updated to allow for re-opening of the waiting list for a period of fifteen (15) calendar days. SAHA will limit the number of applications to be selected to a number which they can expect to select within a reasonable period (i.e., 1-2 years). All applications received through the online application during the open period will be assigned a random number, and those that meet the limit will be placed on the waiting list. The below language outlines the lottery procedure and how applications are then ranked on the waiting list based on preferences claimed and their assigned lottery number.

4.2.C OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]

(2) Reopening the Waiting List

- (a) If the waiting list has been closed, it cannot be reopened until SAHA publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets.
- (b) The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received.

(3) Any temporary closing and reopening of any waiting list for programs in the Assisted Housing Programs will be done via the online application.

(4) SAHA will announce the reopening of the waiting list at least ten (10) business days prior to the date applications will first be accepted.

(5) SAHA will give public notice by publishing the relevant information in suitable media outlets.

(6) The waiting list may be reopened for a period of fifteen (15) calendar days, during which time all applications will be received through the online application. SAHA will determine the number of applications needed to retain a one (1) to two (2) year wait time. All applications submitted are assigned a random number and those applications that meet the limit will be placed on the waiting list.

(a) SAHA will notify applicants by either mail or email of their application being selected or not selected for the waiting list.

(7) Applications selected for the waiting list through the lottery drawing will be placed on the waiting list in the following order:



(a) Highest combined preference points for preferences claimed.

(b) Lowest randomly assigned lottery number.

See figure 4.1, in which five applicants are listed in the order they will be ranked on the waiting list.

Figure 4.1 Waiting List Placement Example

Applicant	Preference Points	Lottery Number
Applicant 1	100	251
Applicant 2	100	499
Applicant 3	80	1190
Applicant 4	80	2753
Applicant 5	40	55
Applicant 6	10	1189
Applicant 7	10	2754
Applicant 8	10	2756

Reason for the Change to 4.2.F(2)(c)

The language in this section has been updated to allow for automatic waitlist maintenance through our new system, My Housing. This system will provide electronic notification twice a year to applicants to determine continued interest, in addition to notifications from SAHA by mail.

4.2.F UPDATING THE WAITING LIST [24 CFR 982.204 (c)]

(2) Purging the Waiting List

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

(c) SAHA may periodically send notices to applicants on the waiting list to determine their continued interest in the program.



- ~~(i) If the notice is sent via mail, it will be sent to the last mailing address listed on the online application.~~
- ~~(i) This notice will be sent to the last mailing address listed on the applicant portal.~~
- ~~(ii) The notice will provide instructions on how the family must confirm their continued interest in the program.~~
- ~~(iii) The notice will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the Section 8 waiting lists.~~
- (d) The family's response must be in the method indicated in the notice and must be received by SAHA on or before the deadline stated in the notice unless a request for an accommodation has been requested by the family prior to the deadline. If the family fails to respond by the deadline, the family will be removed from the waiting list.
- (e) If a notice is sent via mail and returned by the post office, the applicant will be removed from the waiting list.
- (f) If a family is removed from the waiting list for failure to respond, the Director or designee may reinstate the family if it is determined that the lack of response was due to SAHA's error, circumstances beyond the family's control, or as a reasonable accommodation.

Reason for the Change to 5.1.C.(6)(b)(ii)(B)

The below language was updated to provide staff and clients with a stronger and clearer definition of "good cause" with examples. This new language was added to multiple sections of the Admin Plan that mention and define "good cause," which are also referenced below.

5.1.C FAMILY OBLIGATIONS

(b) Supply Information to SAHA for Use in Reexaminations

The family must supply any information requested by SAHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements.



(i) Interim Reexaminations

The family must report to SAHA, in writing, any of the following changes of the family's circumstances, within ten (10) business days of the date the change took effect:

- (A) Any increase in earned and unearned income for FSS Participants, EID Participants, Homeownership Participants and Zero-Income Participants; and
- (B) Any change of family composition, as stated in 5.1.C(6)(I).

(ii) Regular Reexaminations

- (A) Information requested by SAHA includes paperwork that shows proof of all income for your household. Examples of income documentation needed are child support income, unemployment benefits, Social Security, Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), retirement benefits, contributions, and employment income. Some examples of required documentation for income verification include the last 4 paycheck stubs from the date of submission, W2 tax forms, and bank statements.
- (B) The family must attend all reexamination appointments scheduled by SAHA. The family may reschedule an appointment for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Requests to reschedule appointments must be made orally or in writing.
 - (a) "Good cause" is defined as ~~an unavoidable conflict, which~~ that seriously affects the health, ~~or~~ safety ~~or welfare~~ of the family. Such conflicts include, but are not limited to, hospitalization and illness.
 - (b) SAHA will request documentation of the "good cause" reason prior to rescheduling.
 - (c) Requests to reschedule will be considered on a case-by-case basis.



This language has been added to the following sections where “good cause” is mentioned and defined:

- 8.2.B(2)(d) INITIAL HQS INSPECTION**
- 8.2.C(1)(b) ANNUAL/BIENNIAL HQS INSPECTIONS**
- 11.1.C(2)(a) SCHEDULING ANNUAL REEXAMINATIONS**
- 16.3.C(6)(b) INFORMAL HEARINGS FOR PARTICIPANTS**

Reason for the Change to 5.2.E(2)(a)(iii)

Voucher extensions are currently being granted at a high rate and are burdensome for staff to process. The below language was updated with allowable reasons for a second extension, which have been limited to reasonable accommodation and if the family was prevented from finding a unit due to disability accessibility requirements or large size bedroom unit requirement.

5.2.E VOUCHER TERM AND EXTENSIONS

(2) Extensions of Voucher Term [24 CFR 982.303(b)]

- (a) SAHA 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 SAHA can approve. Discretionary policies related to extension and expiration of search time must be described in SAHA’s administrative plan [24 CFR 982.54].

- (i) A family may submit a written request/statement for an extension of the voucher time period.
- (ii) A request for an extension must be submitted to SAHA within ten (10) business days of the voucher expiration date.
- (iii) SAHA will grant an extension of the initial voucher term upon the family’s request.



(A) SAHA may grant additional voucher extensions past 120 days (initial voucher term and first extension) for the following reasons only:

- (1) ~~Extenuating circumstances such as hospitalization or a family emergency for an extended period of time that has affected the family's ability to find a unit within the initial sixty-day period. Verification is required. Reasonable Accommodation for persons with disabilities; and~~
- (2) ~~SAHA is satisfied that the family has made a reasonable effort to locate a unit, including seeking the assistance of SAHA, throughout the initial sixty-day period. A completed search record may be required.~~ The family was prevented from finding a unit due to disability accessibility requirements or large size bedroom unit requirement.

Reason for the Change to 5.2.E(3)(a)

Updated Tolling Policy: Staff and clients required clarification of how SAHA will calculate remaining search time if the clock in Elite has been stopped and then restarted due to the RTA being voided.

5.2.E VOUCHER TERM AND EXTENSIONS

(3) Suspensions of Voucher Term [24 CFR 982.303(c)]

- (a) SAHA must suspend the housing choice voucher term if the family has submitted a Request for Tenancy Approval (RTA) during the voucher term [Federal Register, September 20, 2015]. "Suspension" means stopping the clock on a family's voucher term from the time a family submits the RTA until the time SAHA approves or denies the request [24 CFR 982.4].

(i) If the RTA is voided, SAHA will allow the family to continue searching for a unit with the number of days left on the voucher search time. That search time will be



effective beginning from the date the family informed SAHA in writing that the RTA was voided.

Reason for the Change to 6.3.A(3)

The below language has been updated to change the recertification time frame of zero income participants from 90 days to six months. The previous recertification time frame was burdensome for staff as the recertification process can take weeks to complete.

6.3.A OVERVIEW OF RENT AND SUBSIDY CALCULATIONS

(3) Zero Income Declaration

- (a) Rents based on a claim of zero income (i.e. zero income and/or TTP equal to or less than \$0) are limited to six months ~~90-days~~.
- (b) After six months ~~90-days~~, zero-income interim rents are recertified and adjusted based on the current household income. However, if zero income is declared by the participant prior to the six-month ~~90-day~~ review date, the zero-income rent will remain.
- (c) Households are required to provide sufficient documentation to support zero income or completion of a Family Expense Summary.
- (d) Households paying rent based on a claim of zero income must report any new income within ten (10) business days from the day they begin receiving the income.
- (e) Zero income rent will continue as long as household qualifies for zero income at six-month ~~90-day~~ reexamination.

Reason for the Change to 7.1.A(2)(d)(i)

The language below was removed to match current SAHA procedure. Family members who will achieve adult status by the next recertification will fill out the necessary paperwork at that recertification.



7.1.A FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516 AND 982.551, 24 CFR 5.230]

(2) Consent Forms

- (a) It is required that all adult applicants and participants sign form HUD-9886, Authorization for Release of Information. 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.
- (b) HUD and SAHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members.
- (c) Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).
- (d) Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

~~(i) If a family member will achieve adult status within 120 days prior to the regularly scheduled recertification, the family member will be required to sign authorization forms to collect necessary information related to the family's assistance.~~

Reason for the Change to 8.1.B(5)

Updated with additional guidance for placement of window air conditioning units.

8.1.B ADDITIONAL LOCAL REQUIREMENTS

(5) Thermal Environment [HCV GB p.10-7]

SAHA must define a "healthy living environment" for the local climate. This may be done by establishing a temperature that the heating



system must be capable of maintaining, that is appropriate for the local climate.

- (a) The heating system must be capable of maintaining an interior temperature of 65 degrees Fahrenheit between November 1 and March 31. Owners of units in non-compliance with this requirement will be given one business day to provide safe and adequate heating equipment.
- (b) In units with a central air conditioning system, the system must be capable of maintaining an interior temperature of 80 degrees Fahrenheit between April 1 and October 31. Owners of units in non-compliance with this requirement will be given three (3) business days to provide safe and adequate air conditioning equipment.
- (c) Whether the unit is supplied with a central air conditioning system or window/room systems, the entire unit, including rooms with independent systems, must comply with the above requirements.
- (d) If no cooling system is provided, windows in the living rooms and bedrooms must have a screen.
- (e) Window air conditioning systems will not be allowed in bedrooms with only one window.

Reason for the Change to 8.1.B(6)

Added clarification regarding window locks as some windows are secured by other means and do not have locks attached to either the window or window sill.

Updated to match new 3-day Special Inspection procedure.

Updated to provide second option for smoke detectors outside bedrooms where no hallway is present.

Added definitions for clarification of rodent or insect infestation.

8.1.B ADDITIONAL LOCAL REQUIREMENTS



(6) **Clarifications of HUD Requirements**

SAHA must define a “healthy living environment” for the local climate. This may be done by establishing a temperature that the heating system must be capable of maintaining, that is appropriate for the local climate.

As permitted by HUD, SAHA has adopted the following specific requirements that elaborate on HUD standards:

(a) **Walls**

Plaster or drywall must be repaired or replaced in areas where it is sagging, severely cracked or otherwise damaged.

(b) **Windows**

(i) Window sashes must be:

(A) In good condition;

(B) Solid and intact; and

(C) Replaced when damaged or deteriorated.

(ii) Windows must be weather-stripped as needed to ensure a watertight seal.

(iii) Window screens, if present, must be in good condition.

(iv) Plexi-glass is not an acceptable glazing replacement.

(v) Window locks must be permanently attached.

(c) **Doors**

All exterior doors must:

(i) Be weather-tight to avoid air or water infiltration;

(ii) Be lockable;

(iii) Have no holes;

(iv) Have all trim intact; and

(v) Have a threshold.

(d) **Floors**

(i) All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be resecured and made level. If they cannot be leveled, they must be replaced.



- (ii) All floors must be in a finished state. Plywood is not acceptable.

(e) Water Heating & Appliances

Hot water must be available at all times at a temperature between 95 degrees and 120 degrees Fahrenheit.

- (i) Owners of units in non-compliance with this requirement will be given ~~five~~ three business days to make the necessary repairs.
- (ii) Units found with inoperable stoves and/or refrigerators will be given ~~five~~ three business days to make the necessary repairs.

(f) Bathrooms

- (i) All bathrooms must have an openable window or exterior exhaust system.
- (ii) If a bathroom does not have an openable window or exterior exhaust, SAHA may permit a ductless ventilation system that prevents the accumulation of unhealthful odors and sewer gases.

(g) Security

If window security bars or security screens are present on emergency exit window, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

(h) Bedrooms

- (i) Bedrooms in basements, attics or converted garages are not allowed unless the owner provides SAHA documentation from ~~a licensed professional such as a licensed general contractor, building official, engineer or city inspector verifying that the room contains no safety hazards, or~~ a Bexar County Appraisal District (Bexar CAD) print-out with the number of bedrooms for the unit.

- (ii) Minimum bedroom size is a 70 square foot area.

(i) Smoke Detectors

- (i) Smoke detectors are required in:
 - (A) Each bedroom and
 - (B) Adjacent hallways on each floor level.



(ii) If no hallway exists, a smoke detector must also be placed outside each bedroom or there must be one (1) smoke detector placed within 30 feet of the bedroom(s).

(j) Exteriors

(i) Mailboxes must be functional and operable.

(ii) The property address must be:

(A) Visible from the street with a minimum requirement size of;

(B) At least 3 inches tall;

(C) In a color that contrasts with the background; and

(D) For multi-family units, individual unit numbers must be present and visible.

(iii) All trash containers must have a cover or attached lid capable of sealing in refuse and trash.

(iv) Property must be free of trip hazards such as gaps or cracks greater than ¾ inches tall on sidewalks, walkways, driveways, common areas, etc.

(k) Utilities

Units that share utility meters are not acceptable, unless:

(i) The owner installs separate utility meters for each unit and service, or

(ii) The residential lease specifies that the unit is an “all bills paid” unit.

(iii) Utilities are allocated in accordance with state and local law.

(l) Infestation

Rodent Infestation

(i) Types of rodents known to cause infestation include, but are not limited to mice and rats.

(ii) If the inspection finds evidence of rodent infestation, the time frame for correction will vary as follows:

(A) If the tenant submits documentation to show that he or she notified the landlord of the infestation at least ten (10) business days prior to the SAHA inspection.



SAHA will require the correction to be made within three (3) business days of the inspection.

- (B) If the tenant does not submit documentation to show that he or she notified the landlord of the infestation at least ten (10) business days prior to the SAHA inspection, SAHA will require the correction to be made in accordance with section 8.2.F(1)(a).

(iii) Correction of rodent infestation may not be self-certified.

Insect Infestation

(i) Types of insects known to cause infestation include, but are not limited to roaches, bed bugs and termites.

(ii) The Inspector is to record their observation as “infestation” in the following circumstances:

(A) When more than one dead insect is observed in a unit or in common areas (e.g., halls, corridors, stairs, laundry room, lobby office, etc.).

(B) When one or more live insect is observed in a unit or in common areas (e.g., halls, corridors, stairs, laundry room, lobby office, etc.).

(iii) Correction of insect infestation may not be self-certified.

Reason for the Change to 8.2.A(4)

Updated to provide guidance regarding tenant attendance requirements for different types of inspections.

8.2.A OVERVIEW [24 CFR 982.405]

(4) Owner and Family Inspection Attendance

HUD permits SAHA to set policy regarding family and owner presence at the time of inspection [HCV GB p. 10-27].

(a) Annual, Complaint, Special and Emergency Inspections



(i) When a family occupies the unit at the time of inspection, an adult (age 18 or over) must be present for the inspection.

(ii) The presence of the owner or the owner's representative is encouraged, but not required.

(b) Initial or Moving Inspection of a Vacant Unit

(i) SAHA will inspect the unit in the presence of the owner, owner's representative or with lockbox access

(ii) The presence of a family representative is permitted, but not required.

(iii) At the inspector's discretion, the family's representative may be asked to provide proof of identification.

Reason for the Change to 8.2.C(1)

Updated to allow the family to miss one inspection without being moved to termination.

8.2.C ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405; 982.406]

(1) Scheduling the Inspection

Each unit under HAP contract must have an annual inspection no more than 24 months after the most recent annual inspection.

(a) If the family misses a two (2) scheduled inspections ~~without SAHA approval~~ or if the notice is returned by the post office with no forwarding address, SAHA may consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

Reason for the Change to 8.2.F(3)

Updated to require landlords to provide self certification of repairs to cut down on number of follow-up inspections. Clarifies self-certification policy on infestations and HAP Contract abatement.



8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

(3) Self-certification of Corrective Action

- (a) In lieu of conducting a physical reinspection to verify corrections of five (5) or fewer HQS owner deficiencies that are not considered life-threatening (see 8.1.C), SAHA will require a self certification of repairs signed by the landlord and tenant.
- (b) If SAHA does not receive the self certification of repairs within the specified time frame, SAHA will schedule a physical reinspection within seven (7) calendar days of the self-certification deadline.
- (c) All self-certifications are subject to a quality control inspection. If the quality control inspection determines that repairs were not completed as certified by the landlord and tenant:
 - (i) SAHA will refuse to accept self-certifications from the landlord for 18 months from the date of the Quality Control Inspection;
 - (ii) The unit will Final Fail; and
 - (iii) The unit will be abated effective the first day of the month following the date on which the self-certification was submitted.
- (d) Self certifications will not be accepted for move-in/initial inspections any infestations, including but not limited to roaches, mice, rats, bed bugs or other insects.

12.1.E MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS

(1) Mandatory Policies [24 CFR 982.553(b) and 982.551(I)]

(c) *Drug-Related and Violent Criminal Activity [24 CFR 5.100]*

- (i) SAHA will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the



HCV program (see section 5.1.C.), as defined by SAHA's Screening Criteria Grid in 3.3.E.

(2) Other Authorized Reasons for Termination of Assistance [24 CFR 982.552(c), 24 CFR 5.2005(c)]

(i) SAHA **will** terminate a family's assistance if:

(A) If SAHA is notified of any household member convicted for engaging in any criminal activities as defined in SAHA's Screening Criteria Grid in 3.3.E.

Reason for the Change to 16.2.B

Updated SAFMR policy to allow for Phase II changes. Also removed Mainstream from list of non-MTW programs as it will be classified under MTW.

16.2.B PAYMENT STANDARDS [24 CFR 982.503; HCV GB, Chapter 7]

(2) Small Area Fair Market Rents [FR Notice 11/16/16]

- (a) In October 2017, HUD will publish Small Area FMRs for the San Antonio-Bexar County area for use in the administration of tenant-based assistance under the HCV program.
- (b) Small Area FMR areas refer to the U.S. Postal Service ZIP code areas within the San Antonio-Bexar County area.
- (c) SAHA must revise the payment standard amount no later than 3 months following the effective date of the published FMR if a change is necessary to stay within the basic range -- between 90 and 110 percent of the published FMR for each unit size.

(d) SAHA will apply HUD SAFMRs to the following non-MTW programs:

- (i) Veterans Affairs Support Housing (VASH) Program, ~~and~~
- ~~(ii) Mainstream for Persons with Disabilities Program.~~



- (e) SAHA will implement local submarket payment standards for MTW Housing Choice Voucher applicants and participants through a phase-in approach.
 - (i) Phase I + will establish the local submarket payment standards through two (2) tiers. Phase I + will be effective for vouchers issued October 1, 2018 or later and November recertifications.
 - (ii) Phase II will establish the local submarket payment standards through ten (10) tiers. Effective date of Phase II will be determined upon HUD approval of SAHA's MTW Plan.

Reason for the Change to Glossary

Added general definition of “Infestation” to coincide with detailed definition added to 8.1.B.

GLOSSARY

Infestation. When more than one dead or live insect or rodent is observed in a unit or in an inspectable item location in common areas (e.g., halls, corridors, stairs, laundry room, lobby office, etc.).

Reason for Changes Regarding Waiting List Preferences

The language in this section has been updated to allow for new preferences that will be effective in the coming year. These preferences are being incorporated through a combination of referrals and partnerships with local agencies to help transition individuals out of supportive service programs, or from homelessness, and into assisted housing to further their progress toward self sufficiency.

Change to 4.3.C(2)

4.3.C SELECTION METHOD

- (1) SAHA must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that SAHA will use [982.202(d)].
- (2) **Local Preferences [24 CFR 982.207; HCV p. 4-16]**



- (a) SAHA is permitted to establish local preferences, and to give priority to serving families that meet those criteria.
- (b) HUD specifically authorizes and places restrictions on certain types of local preferences.
- (c) HUD also permits SAHA to establish other local preferences, at its discretion.
- (d) Any local preferences established must be consistent with SAHA's plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

(e) Preferences may be verified prior to selection but must be verified by time of selection from the waiting list. If a selected preference cannot be verified by SAHA at the time the applicant is selected from the waiting list, the applicant will be returned to the waiting list in the order he or she would have been ranked had the preference not been selected.

(f) **Waiting List Preferences**

SAHA'S waiting list preferences are defined below and shall be assigned points as indicated. SAHA will accept applications from preference applicants even when the waiting list may otherwise be closed. Applicants who qualify for a preference will not be required to complete the online registration but will be placed directly on the waiting list in order of total combined preference points.

(i) **Homeless Referrals (100 Points)** – Families certified by a designated social service agency as homeless and referred to SAHA under the terms and conditions of a Memorandum of Agreement with the certifying social service agency, such as Haven for Hope, San Antonio Metropolitan Ministries, and the Center for Health Care Services.

(ii) **Move On Referral (100 Points)** – Families currently residing in Permanent Supportive Housing (PSH) and certified as no longer requiring supportive services by a designated PSH provider currently partnered with SAHA.

(iii) **Palo Alto Set Aside Referral (75 Points)** – Homeless students referred by Palo Alto Community College who are currently enrolled in at least six (6) credit hours at Palo Alto College in a degree or certificate program.

(iv) **5-Year Mainstream Participants (75 Points)** – The first 100 applicants on the tenant-based voucher waiting list who have a



household member at least 18 years or older with a disability. 79 families with a non-elderly disabled Head of Household will be certified and referred by a designated social service agency currently partnered with SAHA.

(iii) SAHA Program Displacement (70 Points) –

- (A) Participants in “good standing” at a SAHA public housing community or a SAHA housing assistance program who will be displaced through no fault of their own; or
- (B) Participants in the Project-Based Voucher program who require an emergency transfer through Violence Against Women Reauthorization Act of 2013 procedures [24 CFR 983.261].

(iv) Public Housing Demolition/Disposition (50 Points) –
Residents in “good standing” at a SAHA public housing community on the date the community was approved by HUD to be disposed or demolished.

(v) Voucher Program Return (40 Points) – Former participants under the tenant based Housing Choice Voucher Program whose assistance was terminated because SAHA did not have sufficient federal funding to continue to provide rental assistance.

Change to 18.6.C(3)

18.6.C ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

- (1) SAHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. SAHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by SAHA. If SAHA chooses to offer a separate waiting list for PBV assistance, SAHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.
- (2) If SAHA decides to establish a separate PBV waiting list, SAHA may use a single waiting list for SAHA’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.

- (3) SAHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. SAHA currently has waiting lists for the following PBV projects:



- (a) Gardens of San Juan
- (b) Wheatley Park
- (c) East Meadows
- (d) Beacon Communities

Change to 18.6.D(4)

18.6.D SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

(4) Preferences [24 CFR 983.251(d)]

(e) SAHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, qualifying families for “excepted units,” mobility impaired persons for accessible units). ~~SAHA will not offer any additional preferences for the PBV program or for particular PBV projects or units.~~

(f) Family Homeless Referral – Families certified by a designated homeless services provider currently partnered with SAHA will receive a voucher for Beacon Communities.

(g) Youth Aging Out of Foster Care Referral – Youth referred through SAHA partner “Thru Project” will receive a voucher for Beacon Communities.

(h) Time-Limited Workforce Pilot Program Referral – Residents working in referred through workforce partners will receive a Project-Based voucher.

(i) St. Philip’s College Homeless Program Referral – Homeless students referred by St. Philip’s College will receive a voucher for Beacon Communities.