

Summary of Revisions to FY2021-22 Admissions & Continued Occupancy Policy

Indicates policy has been added

~~Indicates policy has been removed~~

Reason for the Change to 3.3 Denial of Admission

Language was added to clarify that SAHA will screen applicants for drug-related criminal activity against the SAHA Screening Criteria Grid, which applies different lookback periods depending on the severity of the crime. Previous policy applied a lookback period of five years to all previous drug-related criminal activity.

Language was also added to allow SAHA to set up repayment agreements with applicant families who owe debts to SAHA.

Two of the Other Permitted Reasons for Denial of Assistance were removed as SAHA does not currently practice denying for those reasons and, additionally, does not have the capability of screening for them. SAHA wants to ensure that families have every opportunity to be admitted to the Public Housing Program and that any reasons for denial are fairly administered.

These changes are being proposed to make the Public Housing Program more accessible to our applicant families.

3.3 DENIAL OF ADMISSION

3.3.C MANDATORY DENIAL OF ASSISTANCE

- (i) SAHA will deny assistance to an applicant family if any member of the household has been evicted from federally assisted housing ~~in the last five (5) years~~ for drug-related criminal activity in accordance with SAHA's Screening Criteria Grid [see 3.3.E SAHA Criminal History Screening Policy].
- (ii) SAHA will admit an otherwise eligible family who was evicted from federally-assisted housing within the past five (5) years for drug-related criminal activity, if SAHA is able to verify that the



household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by SAHA, or the person who committed the crime, is no longer living in the household.

3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

- (d) SAHA will deny admission to an applicant family if SAHA determines that the family:
- ~~(i) Has one (1) or more evictions for non-payment of rent within the past three (3) years;~~
 - ~~(A) SAHA will consider extenuating circumstances such as whether the applicant's rent was subsidized or not at the time of such evictions.~~
 - ~~(ii) Has a pattern of unsuitable past performance in meeting financial obligations, including rent within the past three (3) years;~~
 - (iii) Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing programs;
 - (iv) Owes rent or other amounts to SAHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family enters into a repayment agreement upon admission.

Reason for the Change to 4.2.B Selection Method

Language was updated in 4.2.B to eliminate preferred developments to streamline waitlist management and reduce applicant wait times.

4.2.B ORGANIZATION OF THE WAITING LIST



- (a) Beginning July 1, 2021, new Public Housing applicants will be added to a single, community-wide waiting list with all SAHA developments. Within that list, SAHA will designate subparts to easily identify who should be offered the next available unit (i.e., general occupancy developments, elderly / disabled developments, accessible units).
- (b) SAHA will maintain the current single community-wide waiting list with preferred developments until exhausted.

Reason for the Change to 4.3.B Selection Method

Added Marie McGuire to the list of available properties under the 80/20 Elderly Preference.

This section also removes the Time-Limited Working Household Referral Program Pilot preference and the Restorative Housing Pilot Program preference as the pilot programs and corresponding MTW activities are being closed out.

A new preference has been added to allow SAHA partner, Center for Health Care Services (CHCS) to refer disabled families to receive on-site supportive services while residing in Victoria Plaza.

4.3.B SELECTION METHOD

(2) Local Preferences [24 CFR 960.206]

(g) **Waiting List Preferences**

Applicants will retain the assigned points throughout the waiting list, eligibility and offer process.

~~(iii) **Time-Limited Working Household Referral Program Pilot (40 Points)** – Pilot program for a maximum of 200 families:~~

~~(A) This activity is designed to increase housing choices and promote self-sufficiency by providing working household in~~



~~need of short-term housing assistance, an opportunity to quickly access public housing units.~~

~~(B) Working household who participate in this activity will receive five years of housing assistance, with a two-year extension if needed based on hardship.~~

~~(C) Preference Eligibility:~~

~~(1) Referral from a partner agency who has entered into a memorandum of understanding with SAHA.~~

~~(2) Enrollment and compliance with the Family Self-Sufficiency (FSS) or Jobs-Plus program.~~

~~(D) The family must execute a lease addendum with a five-year term limit and a FSS or Jobs-Plus contract at the time of admission.~~

~~(E) Noncompliance with FSS or Jobs-Plus program requirements is considered a serious violation of the lease and grounds for lease termination.~~

~~(iv) **Restorative Housing Program Pilot (40 Points)** — Pilot program for a maximum of 50 probationers and their immediate families.~~

~~(A) The population gap will include both probationers coming into new public housing units with their families and probationers who are moving in with immediate family that are already living in public housing units.~~

~~(B) Preference Eligibility:~~

~~(1) Referral from a partner agency who has entered into a memorandum of understanding with SAHA.~~

~~(2) Enrollment and compliance with the Family Self-Sufficiency (FSS) Program and probation requirements.~~

~~(C) The family must execute a lease addendum and an FSS contract at the time of admission.~~

~~(D) Noncompliance with FSS program requirements and probation requirements is considered a serious violation of the lease and grounds for lease termination.~~

~~(E) If a probationer applies to the pilot and their probation term expires before a spot in the pilot opens, their referral will~~



~~expire and they will need to re-apply for housing assistance.~~

~~(F) Probationers that commit a crime after being accepted into the pilot but before moving into their unit will be removed from the pilot and evicted under AGOP procedures.~~

(v) **80/20 Elderly Preference (40 Points)** - Extended to elderly families for 80/20 properties.

(A) SAHA implemented an 80 to 20 ratio of elderly to non-elderly disabled residents at Marie McGuire, Fair Avenue, WC White and Lewis Chatham to maintain an optimal mixed population in each community.

(B) SAHA will select elderly residents families from the waiting list at a higher rate than the 4-to-1 ratio to assist properties in meeting the target 80/20 mix.

(C) This preference will automatically be applied to those that meet the preference eligibility criteria until such time as an optimal mix of elderly and non-elderly disabled residents is reached for an 80/20 community. Preference may be applied only to maintain the designated ratio of populations at 80/20 properties.

(D) ~~Preference Eligibility:~~

~~(1) Be a elderly family; and~~

~~(2) Select either Fair Avenue, WC White or Lewis Chatham through the online application.~~

(vi) **Victoria Plaza Supportive Services Preference (40 Points)** - Extended to disabled families referred by Center for Health Care Services (CHCS).

(A) Families referred will be given preference at the Victoria Plaza community and will receive on-site supportive services from CHCS.

Reason for the Change to 6.1.E Earned Income Disallowance

This section was updated to reflect the discontinuation of S-EID effective in the FY21-22 MTW Plan. Note that the traditional EID calculation will still not be used. A citation to SAHA's FSS Action Plan was also added.



6.1.E EARNED INCOME DISALLOWANCE [24 CFR 960.255; Streamlining Final Rule (SFR) Federal Register 3/8/16]

(2) Simplified-Earned Income Disallowance (S-EID)

~~(a) Per MTW Activity “FY2013-2: Simplified Earned Income Disregard (EID),” SAHA will not disregard income for MTW participants using the traditional EID calculation.~~

~~(a) **Eligibility**~~

~~(i) The S-EID is offered to family members 18 years and older currently participating in the Jobs Plus Program.~~

~~(ii) To continue receiving the benefit, residents must comply with public housing lease terms and Jobs Plus program requirements, including a SAHA-referred financial literacy course.~~

~~(ii) To qualify, the family must experience an increase in annual income that is the result of one of the events of 6.1.E(1)(a)(i)(A)-(C) above.~~

~~(b) **Lifetime Limitation**~~

~~(i) This S-EID has a five-year lifetime maximum, which will not be suspended due to periods of unemployment.~~

~~(c) **Calculation of the Disallowance**~~

~~(i) Year One: 100% of the earned income disregarded;~~

~~(ii) Year Two: 80% of the earned income disregarded;~~

~~(iii) Year Three: 60% of the earned income disregarded;~~

~~(iv) Year Four: 40% of the earned income disregarded; and~~

~~(v) Year Five: 20% of the earned income disregarded.~~

~~(d) The initial 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.~~

~~(e) An S-EID or JP-EID participant is not eligible to have an escrow account.~~



(4) Family Self-Sufficiency (FSS)

(g) See SAHA's FSS Action Plan for additional information.

Reason for Change to 6.1.K: "Periodic and Determinable Allowances"

Language was added to 6.1.K(3)(e) to state that contributions provided to SAHA families by SAHA partners would not count toward a family's income. The reason for this change is to allow assisted families access to contributions from community partners without financial burden. Contributions covered by this policy include regular monetary and nonmonetary contributions or gifts provided by SAHA partners such as regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), cash or other liquid assets, and "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Contributions not covered by this policy include any regular monetary and nonmonetary contributions or gifts from persons not residing in the household, including from organizations not officially partnered with SAHA.

This change is being proposed in the MTW Activity FY2022: SAHA Partnerships Providing Basic Needs for Residents Through Income Exclusions.

6.1.K PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

(3) Regular Contributions or Gifts

(e) SAHA will not include in income regular monetary or nonmonetary contributions or gifts provided by SAHA partners.



Reason for the Change to 9.3.B(7)(b)(i) Changes in Family and Household Composition

Language was added to establish a specified timeframe for move-out of live-in aides when the Head of Household (sole family member) passes away.

9.3 INTERIM REEXAMINATIONS [24 CFR 960.257; 24 CFR 966.4]

9.3.B CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

(7) Departure of a Family or Household Member

(i) If a live-in aide is the only remaining member of the household, the live-in aide must vacate the unit within 10 business days.

Reason for the Change to 9.3 Interim Reexaminations

Language was added for 9.3.C to specify that SAHA will not decrease income from child support payments or temporary employment until it has been decreased for three consecutive months. This language is being added to align policy with current procedures; since child support payments and temporary employment can stop and start periodically, waiting for supporting documentation will reduce the administrative burden due to the changing nature of those payments.

Additionally, this section was updated to state that SAHA will not process increases in income over \$200 in earned and unearned monthly income, including new employment. This will allow our families to maintain their current rent amount and will reduce staff burden, cost and time spent processing changes. SAHA will still process all increases for FSS Participants, EID Participants and Zero-Income Participants.

Language was also added to clarify SAHA's actions when a change of income is reported and to align with Housing Choice Voucher Program policy.



9.3 INTERIM REEXAMINATIONS [24 CFR 960.257; 24 CFR 966.4]

9.3.C CHANGES AFFECTING INCOME OR EXPENSES

(b) *Required Reporting*

- (B) SAHA will not process increases in income under \$200 in earned and unearned monthly income, including new employment.
- (C) SAHA will process all increases in earned and unearned income for FSS Participants, EID Participants and Zero-Income Participants.
- ~~(B) SAHA will process all changes in earned and unearned income.~~

(c) *Optional Reporting*

- (iii) If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, SAHA will note the information in the tenant file, but will not conduct an interim reexamination.
 - (A) This does not apply to FSS clients, Homeownership Participants, and participant's reporting zero income, all changes must be completed.
- (iv) If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, SAHA will conduct an interim reexamination. See Section 11.2.D. for effective dates.
- (v) Families may report changes in income or expenses at any time.
- (vi) SAHA will not decrease income from temporary job placements until the family provides evidence that payments have decreased for three consecutive months.



(A) Once documentation of decreased income from temporary job placements is received, the decrease in income will be retroactively applied to the first of the month following the date in which the decrease was first reported.

(vii) If the family declares that it has received a decrease in child support payments, SAHA will not decrease income until the family provides supporting documentation that payments have decreased for three consecutive months.

(A) Once documentation of decreased child support is received, the decrease in income will be retroactively applied to the first of the month following the date in which the decrease was first reported.

Reason for the Change to 12.4 Transfer Processing

This section was updated to revert back to policy from 2017 and states that SAHA will not conduct an annual reexamination at transfer. This change will alleviate staff burden, which has increased since the policy was changed after 2017.

12.4 TRANSFER PROCESSING

12.4.F REEXAMINATION POLICIES FOR TRANSFERS

(1) SAHA will not perform a new annual reexamination if the family transfers to a new unit. If the family moves to a new unit, SAHA will perform a new annual reexamination, unless a reexamination has been conducted within the last 120 days.

Reason for the Change to 16.3.B Family Debts to SAHA

Language was removed from 16.5.B(4)(b)(i) to align with the policy change above; being an applicant does not disqualify someone from establishing a repayment agreement.



16.3.B FAMILY DEBTS TO SAHA

(g) *No Offer of Repayment Agreement*

SAHA will not offer the family a repayment agreement when the following circumstances apply:

- ~~(i) The family is an applicant;~~
- (ii) The family has an existing repayment agreement with SAHA;
- ~~(ii)~~ (iii) The family has not completed a repayment agreement within the last six (6) months;
- ~~(viii)~~ (iii) The amount owed is \$25 or less; or
- ~~(v)~~ (iv) The amount owed by the family exceeds \$3,000.

(A) If the amount owed by the family exceeds \$3,000, the family may pay to reduce the total amount owed to or below the \$3,000 cap in addition to the down payment.

Reason for the Change to 16.6.B(3)(a) Record Retention

Language was added to clarify that unnecessary documents should be removed after three years of retention, and that this applies to “continued eligibility,” meaning “recertifications.” Therefore, staff only need to retain recertification documents from the last three recertification years.

16.6 RECORD KEEPING

16.6.B RECORD RETENTION

- (3) SAHA must keep confidential records of all emergency transfers requested under SAHA’s Emergency Transfer Plan, and the outcomes of such requests, and retain the records for a period of three years, or for a period of time as specified in program regulations [24 CFR 5.2002(e)(12)].



- (a) SAHA will keep the last three recertification years of the Form HUD-50058 and supporting documentation, and for at least three years after the end of participation all documents related to a family's continued eligibility, tenancy, and termination.