



Summary of Revisions to FY2021-22 Administrative Plan

Indicates policy has been added

~~Indicates policy has been removed~~

Contributions from SAHA Partners Not Counted As Income

Reason for update to 6.1.K: “Periodic and Determinable Allowances”

Language was added to 6.1.K(3)(f) 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

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



Administering Enhanced Vouchers

Reason for update to 3.2.A: “Income Eligibility and Targeting” and 4.3.B: “Selection and HCV Funding Sources”

Language was added to 3.2.A(3) to state that SAHA will be administering enhanced vouchers.

3.2 BASIC ELIGIBILITY CRITERIA

3.2.A INCOME ELIGIBILITY AND TARGETING

(c) SAHA will administer enhanced vouchers for at-risk households in accordance with HUD requirements.

Decrease in Child Support Payments and Temporary Employment Income

Reason for update to 11.2.C: “Changes Affecting Income or Expenses”

Language was added to 11.2.C(4)(d)(vi) to specify that SAHA will not decrease income from child support payments and temporary employment until they have 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.

11.2.C CHANGES AFFECTING INCOME OR EXPENSES

(4) Family-Initiated Interim Reexaminations



(d) **Optional Reporting**

(vi) If a 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.

(vii) 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.

Multiple Live-In Aides

Reason for update to 3.1.M: “Live-in Aide”

Language was updated to specify that SAHA may approve a family to have more th/an one live-in aide if it is determined to be a reasonable accommodation for a disability.

3.1.M LIVE-IN AIDE

(7) SAHA will approve a one or more live-in aides if needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability. Approval of a live-in aide for reasonable accommodation will be in accordance with CFR 24 Part 8 and Chapter 2 of this Administrative Plan.



Reason for update to 5.1.C “Family Obligations”

Language was added / inserted into 5.1.C(6)(p)(ii) to specify that SAHA may approve a family to have more than one live-in aide if it is determined to be a reasonable accommodation for a disability.

5.1.C FAMILY OBLIGATIONS

(6) Family Obligations [24 CFR 982.551; Form HUD-52646, Voucher]

(p) Obtain SAHA Approval for Residency of a Foster Child or Live-in Aide

(ii) SAHA will approve ~~a~~ one or more live-in aides if needed as a reasonable accommodation to make the program accessible to and usable by the family member with a disability. See Chapter 2 and § 3.1.M for more information.

Pregnancy and Adoption in Family Unit Size

Reason for update to 5.2.B: “Determining Family Unit (Voucher) Size”

Language was added to 5.2.B(4) to specify situations where anticipated children will be counted in the family voucher size; pregnancy will be counted upon submission of supporting documentation and adoptions will be counted after proof that the adoption is complete or awarded.

5.2.B DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

(4) SAHA will assign one bedroom per two persons within the household, except in the following circumstances:



- (e) All children anticipated to reside in a dwelling unit will be included in determining unit size upon submission of supporting documentation. For example, children expected to be born to pregnant women or children whose custody is being obtained by an adult.
- (f) Adopted children will be included in determining unit size when the family is able to submit supporting documentation that the adoption is complete or awarded.

Previous Terminations: Three-Year Versus Five-Year Offenses

Reason for update to 3.3.C: “Mandatory Denial of Assistance”

Language was added to 3.3.C(1)(a) and (b) 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.

The reason for this change is to make the HCV Program more accessible to our applicant families.

3.3.C MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(a)]

HUD requires SAHA to deny assistance in the following cases:

- (a) 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].
- (b) 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.



Reason for update to 3.3.D “Other Permitted Reasons for Denial of Admission”

Language was altered in 3.3.D(4)(a)(iii) and (iv) to clarify that SAHA will deny assistance for previous terminations (unrelated to drug-related criminal activity) up to three years prior to selection from the waitlist, rather than five years prior. This aligns with policy in place for SAHA’s Public Housing Program. The reason for this change is to make the HCV Program more accessible to our applicant families.

3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

(4) Previous Behavior in Assisted Housing [24 CFR 982.552(c)]

- (a) SAHA will deny assistance to an applicant family for the following reasons:
 - (i) The family does not provide information that SAHA or HUD determines is necessary in the administration of the program.
 - (ii) The family does not provide complete and true information to SAHA.
 - (iii) Any family member has been evicted from federally-assisted housing in the last **three five** years.
 - (iv) Any PHA has terminated housing assistance for any member of the family in the past **three five** years.

Obtaining Verification: Bedrooms in Basements, Attics, or Converted Garage

Reason for update to 8.1.B: “Additional Local Requirements”

Language was added to 8.1.B(6)(h)(i) from previous policy (Admin Plan FY 2017-2018) to revert to allowing landlords an option to obtain verification of additional bedrooms through Bexar CAD or a licensed professional, versus requiring authorization only through Bexar CAD.



8.1.B ADDITIONAL LOCAL REQUIREMENTS

(6) Clarifications of HUD Requirements

(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.

Informal Reviews Permitted for Expired Vouchers

Reason for update to 16.3.B: “Informal Reviews”

Language was added to 16.3.B(3)(c) to state that SAHA will provide an informal review upon the denial of a voucher term extension or suspension. Even if SAHA is not required to by HUD to provide a review under this circumstance [24 CFR 982.555], permitting these informal reviews has often resulted in overturns and additional chances for the family. Language was removed that stated SAHA will only offer applicants the opportunity for an informal review when required by regulations.

16.3.B INFORMAL REVIEWS

(3) Decisions Subject to Informal Review

- (c) In addition to the requirements outlined in 16.3.B(3)(a), SAHA will also offer applicants an opportunity for an informal review upon denial of voucher term extension or suspension. ~~only offer applicants the opportunity for an informal review when required by regulations [see 16.3.B(3)(a)].~~



Inspection Results Available on Landlord Portal

Reason for update to 8.2.F: “Inspection Results and Reinspections for Units Under HAP Contract”

Language was updated to reflect current practice that SAHA posts inspection results for the owner electronically to the Landlord Portal.

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

(1) Notification of Corrective Actions

- (i) Within five business days of the completed inspection, SAHA will provide notification of the inspection results to the family via mail or email, and to the owner via SAHA’s Landlord Portal, mail or email. Generally, SAHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The **written** notice will state:
 - (A) The time frame within which the failure must be corrected; and
 - (B) Failure to correct owner-caused deficiencies within the specified time frame (or any SAHA-approved extension period) will result in the termination of the owner’s HAP in accordance with 8.2.G; and/or
 - (C) Failure to correct family-caused deficiencies within the specified time frame (or any SAHA-approved extension period) will result in the termination of the family’s assistance in accordance with policies in Chapter 12.

Applicants with Previous Debts Owed

Reason for update to 3.3.D “Other Permitted Reasons for Denial of Admission”

Language was added to 3.3.D(4)(a)(vii) to specify that an applicant family may still be allowed onto the HCV program with previous debts owed to SAHA if they agree to enter into a repayment agreement upon admission to the program. This is only applicable to



debts owed to SAHA and no other public housing agency. The reason for this change is to make the HCV Program more accessible to our applicant families.

3.3.D OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

(4) Previous Behavior in Assisted Housing [24 CFR 982.552(c)]

a) SAHA will deny assistance to an applicant family for the following reasons:

(vii) The family 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 update to 16.5.B “Repayment Policy”

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

16.5.B REPAYMENT POLICY

(4) General Repayment Agreement Guidelines for Families

(b) *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;
- (iii) SAHA determines that the family committed program fraud;



- (iii) The amount owed by the family exceeds \$3,000; or
- (iv) The amount owed by the family is less than \$100.

Project-Based Voucher Program (PBV) Waitlist

Reason for update to 18.6.C: “Organization of the Waiting List”

Language was updated in 18.6.C(3) to establish a single waiting list for the PBV Program. While SAHA currently administers separate waiting lists for each PBV development, the consolidation will streamline waitlist management and reduce applicant wait times.

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

- (3) SAHA will establish and manage a separate waiting list for SAHA’s entire PBV program. ~~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~~
- (a) If a separate waiting list is required for any PBV developments, SAHA will maintain a separate waiting list in accordance with the development’s management agreement.

Reason for update to 18.6.D: “Selection from the Waiting List”

Language was removed from 18.6.D(4)(i) to clarify that the St. Philip’s College Homeless Program is not being administered as a PBV program.

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



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

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

Rental Assistance Demonstration (RAD) Conversion

Reason for update to 19.3.A: “Moderate Rehabilitation”

Language was added to 19.3.A to allow SAHA to assist Mod-Rehab partners in converting to Rental Assistance Demonstration (RAD) if they express interest to SAHA.

19.3.A MODERATE REHABILITATION (MOD-REHAB)

(9) If any owner of a Mod-Rehab property expresses interest in converting housing assistance under HUD's Rental Assistance Demonstration (RAD) program, SAHA will work directly with the owner as needed to provide information and facilitate the conversion.