Summary of Revisions to
FY 2022 - 2023 Administrative Plan

Indicates policy has been added
Indicates policy has been removed

FY22-23 SAHA CHR Screening Criteria Grid Policy Update

Updates have been made to SAHA's Criminal History Screening Criteria Grid in an effort to establish more equitable admissions standards for applicant families.

3.3.E SAHA CRIMINAL HISTORY SCREENING POLICY

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SAHA Screening Criteria Grid

<table>
<thead>
<tr>
<th>Offense Category</th>
<th>Within seven (7) years of offense</th>
<th>Within five (5) years of offense</th>
<th>Within three (3) years of offense</th>
</tr>
</thead>
<tbody>
<tr>
<td>Violent Criminal Activity</td>
<td>● 1st Degree / 2nd Degree Homicide</td>
<td>● Assault (Misdemeanor)</td>
<td>● Assault by Contact</td>
</tr>
<tr>
<td></td>
<td>● Manslaughter / Criminally Negligent Homicide</td>
<td>● Deadly Conduct (Misdemeanor)</td>
<td>● Crimes against Animals</td>
</tr>
<tr>
<td></td>
<td>● Assault (Felony)</td>
<td>● Stalking</td>
<td></td>
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<tr>
<td></td>
<td>● Aggravated Assault</td>
<td>● Harassment</td>
<td></td>
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<tr>
<td></td>
<td>● Robbery (All Types), including Aggravated Robbery</td>
<td>● Crimes involving Terrorism / Terroristic Threat</td>
<td></td>
</tr>
<tr>
<td></td>
<td>● 1st Degree Felony Injury to a Child, Elderly or Disabled Individual</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Sexual Assault / Sex Offenses</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Deadly Conduct (Felony)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Weapons Offense (Against Person)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Kidnapping, Abduction,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Drug-Related Criminal Activity</td>
<td>Other*</td>
<td></td>
<td></td>
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<tr>
<td>-------------------------------</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>● Drug Offense (Manufacture, Distribution, or Possession with Intent to Distribute)</td>
<td>● Abandoning or Endangering Child</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Driving under the Influence If two (2) or more convictions</td>
<td>● Arson-related</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Drug Offense (Possession) (If two or more felony convictions)</td>
<td>● Human Trafficking / Human Smuggling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Driving under the Influence / Driving while Intoxicated or other Alcohol-Related Conviction (If two or more convictions)</td>
<td>● Fraud</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Drug Offense (Possession) - Misdemeanor / Felony</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Drug Offense (Possession) - Misdemeanor / Felony within the past six months**</td>
<td>● Trespassing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Drug Offense (Possession) - Misdemeanor / Felony</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (If two or more convictions)</td>
<td>● Theft/Stolen Property (if 2 felony convictions or more)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Weapons-related (other than use of weapons against person) Unlawful Carrying of a Weapon</td>
<td>● Abandoning or Endangering Child</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Criminal Mischief / Damage / Property Vandalism (Felony Only)</td>
<td>● Prostitution (Felony Only)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>● Felony Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (If two or more convictions)</td>
<td>● Solicitation</td>
<td></td>
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</tr>
<tr>
<td>● Misdemeanor Offenses not otherwise on the grid that demonstrate a pattern of illegal behavior (2 or more convictions)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*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).

**HUD requires SAHA to deny assistance if any household member is currently engaged in the use of illegal drugs. SAHA defines currently engaged in as any use of illegal drugs during the previous six months.
Application of Payment Standards Between Recertifications

Reason for update to 6.3.C “Applying Payment Standards [24 Cfr 982.505; 982.506(B)]]“:

Language was added to clarify the application of increased payment standards in between recertifications.

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(d) Increases
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(iii) For MTW participants, SAHA will apply the increased payment standard during processing of any approved requests for rental increases in between triennial recertifications.

Photos and Digital Scans of Original Verification Documents

Reason for update to 7.1.B “Overview of Verification Requirements”:

In order to move SAHA toward being a more digitally literate agency, particularly in the era of COVID-19, language was added in 7.1.B(2)(b) to specify that the agency will accept clear and legible photos or digital scans of original documents.

7.1 GENERAL VERIFICATION REQUIREMENTS

7.1.B OVERVIEW OF VERIFICATION REQUIREMENTS

(2) Requirements for Acceptable Documents

(b) SAHA may accept clear and legible photos or digital scans of original documents.

(i) SAHA may at any time request the original document for verification.
Removing Landlord Self Certification for Inspections

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

Language was removed from 8.2.F(3) and 8.2.F(4) since SAHA will no longer permit landlords to self certify Housing Quality Standards (HQS) inspections. The current self-certification policy creates undue administrative procedure / burden and adds time to the inspections process, which leads to landlord and resident complaints. Additionally, the resident is not always aware of the items that have or have not been repaired, and sometimes signs the self certification without repairs being completed.

8.2 THE INSPECTION PROCESS

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

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(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 any infestations, including but not limited to roaches, mice, rats, bed bugs or other insects.


(4) **Reinspections**

(d) If at the end of a corrective period or any SAHA-approved extension, a reinspection finds two or fewer HQS owner deficiencies were not corrected, the landlord and tenant may submit a self-certification that the remaining failed items were completed to avoid the abatement of the HAP contract.

(i) The self-certification form must be submitted to the inspections office no later than seven (7) calendar days from the reinspection date.

(ii) If the form is not received within seven (7) calendar days, the unit will be abated the first day of the month following the date on which the inspection final failed.

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**Biennial Recertifications for all Assisted Families**

**Reason for update to 11.1.C “Scheduling Annual Reexaminations”:**

Language regarding biennial recertifications was removed from the MTW policy on alternative recertification schedules in order for all residents to be moved to a triennial recertification schedule. This change was made in order to relieve staff burden and serve residents more efficiently.

(1) SAHA 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 p. 12-1].

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(e) **Triennial Recertifications**

SAHA will conduct a recertification of household income and family composition every three years if the household meets the following criteria:

(i) The household has at least one (1) elderly and/or disabled member, and

(ii) The household receives 100% of their income from fixed income sources.
Addressing MOD Rehab Program in Emergency Transfer Plan

Reason for update to Exhibit 16-2: “SAHA Emergency Transfer Plan”:

Language was added to Exhibit 16-2 Part 4 Section 5: Emergency Transfer Timing and Availability.

EXHIBIT 16-2: SAHA EMERGENCY TRANSFER PLAN

Part 4: Emergency Transfer Timing and Availability

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(5) Section 8 Moderate Rehabilitation (Mod Rehab) Program

According to PIH Notice 2017-08, the VAWA rules regarding Emergency Transfer Plans apply to Mod Rehab as a “Covered Housing Program” (24 CFR 5.2003).

(a) If the case falls under VAWA definitions, SAHA will offer the family a tenant-based voucher and follow the expedited move process detailed above for the Housing Choice Voucher Program.

(b) For families who request to move sooner than when a tenant-based voucher will be available, SAHA will offer the participant a transfer to an available Mod Rehab unit or Project-Based Voucher unit provided the participant meets any tenant screening or eligibility requirements of the property.

(i) Participants will not be denied admission on the basis or as a direct result that the applicant is or has been a
Adjusting Program Parameters for Move On Program [MTW Activity]

Reason for update to 19.4.A “Move On Program Overview”:

Language was added in 19.4.A(1) for a general category of "other supportive housing" to continue to communicate the flexibility we have inherited with the MTW waiver. The reference to MTW Activity FY 2019-2020 was also added since this is when the Move On Program was first created as an amendment to the original 2011 MTW Activity.

19.4 MOVE ON PROGRAM

19.4.A OVERVIEW

(1) The Move On Program provides 40 tenant-based vouchers for families currently residing in Permanent Supportive Housing (PSH), Rapid Rehousing (RRH), or other supportive housing to transition to subsidized housing via the housing choice voucher. The program is designed to serve those who previously experienced chronic homelessness, have been successfully served through PSH supportive housing and will benefit from on-going housing subsidy to prevent a return to homelessness. Current partner is the South Alamo Regional Alliance for the Homeless (SARAH) [see MTW Activity FY 2011-9 and MTW Activity FY 2019-2020 Amendment].