Glynis Tanner

*Acting President / CEO*

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**ADMINISTRATIVE PLAN: Proposed Changes for 2022-2023**

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| **Page** | **Section** | **Change** |
| 2-3 | Discrimination Complaints | Revised language based on Notice PIH 2014-20. Added “Provide written notice of “receipt of” the complaint to those alleged to have violated the rule…. |
| 4-6 | Updating the Waiting ListThis update request will be sent to the last known address that MHA has on record for the family. The family’s response must be in writing and may be delivered in person, by mail, email, or by fax. Responses should be postmarked or received by the MHA no later than 15 business days from the date of the MHA letter. | Updating the Waiting ListRevised: This update request will be sent to the last known address or email address that MHA has on record for the family.The family’s response must be in writing and may be delivered in person, by mail or email. Responses should be postmarked or received by the MHA no later than 15 business days from the date of the MHA letter. (SAVE MY SPOT in rent café). |
| 4-11/4-12 | The Application Interview  Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview. | Any required documents or information that the family is unable to provide at the interview must be provided within 7 calendar days of the interview. |
| 5-3 | Oral Briefing  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. | Oral Briefing  Remove: 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. |
| 6-48 | Utility Reimbursement  How are utility reimbursements issued? | **Utility Reimbursement**  **Add: How are utility reimbursements issued?** Tenants are issued debit cards that can be used anywhere visa is accepted. |
| 8-13 | Timing of Inspections  The MHA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 7 days of date the unit is ready for inspection, as documented on the Request for Tenancy Approval (RFTA). | Timing of Inspections  The inspection company will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 7 days of date the unit is ready for inspection, as documented on the Request for Tenancy Approval (RFTA). |
| 8-15 | Utilities  If utility service is not available for testing at the time of the initial inspection, the MHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The MHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the MHA. | Utilities  Revise to: If utility service is not available for testing at the time of the initial inspection, the MHA will reschedule the inspection. Utilities must be in service for testing at the time of the reinspection. If the utilities are not operable the unit will be disqualified. |
| 8-15 | Appliances  If the family is responsible for supplying the stove and/or refrigerator, the MHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the MHA. The MHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval. | Appliances – Keep this and add to the normal process.  If the family is responsible for supplying the stove and/or refrigerator, the MHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the MHA. The MHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval- REMOVE |
| 8-17 | Inspection results  When life-threatening conditions are identified, the MHA will immediately notify both parties by telephone, facsimile, or email. | Inspection results  When life-threatening conditions are identified, the MHA will immediately notify both parties by telephone, ~~facsimile~~, or email. |
| 9-4 | Requesting Tenancy Approval  Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, or by fax.  Corrections to the terms of the RTA and/or the proposed lease will only be accepted as hard copies, in-person, by mail or by fax. The MHA will not accept corrections by phone | Requesting Tenancy Approval  Add and Revise: Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, or by email.  Add and Revise: Corrections to the terms of the RTA and/or the proposed lease will only be accepted as hard copies, in-person, by mail or by email. The MHA will not accept corrections by phone. |
| 9-11 | PHA Review of Lease  Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by fax.  The MHA will not review the owner’s lease for compliance with state/local law. | PHA Review of Lease  Add: Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, email, or by fax.  Revise: The MHA will review the owner’s lease for compliance with HUD regulation and HAP contract. |
| 9-13 | HAP Contract Execution  The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the MHA. The MHA will ensure that both the owner and the assisted family receive copies of the dwelling lease. | HAP Contract Execution:  Revise: The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the MHA The owner will ensure that assisted family receive copies of the executed dwelling lease. |
| 9-13 | HAP Contract Execution  As required under VAWA 2013, once the HAP contract and lease have been executed and the family has been admitted to the program, the MHA 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) | HAP Contract Execution  Remove: We don’t give these forms out during this time, only when the need arises, and it has been determined that the tenant need to complete such forms. Tenants have only completed the HUD-5382 not the HUD-5380  Edit: The VAWA forms are provided at eligibility, during a move and at recertification. May not be required after lease-up of a unit. |
| 10-5 | Moving Process (Voucher Issuance and Briefing)  For families approved to move to a new unit within the MHA’s jurisdiction, the MHA will issue a new voucher within 10 business days of the MHA’s written approval to move. No briefing is required for these families. | Moving Process (Voucher Issuance and Briefing)  For families approved to move to a new unit within the MHA’s jurisdiction, the MHA will issue a new voucher within 10 business days of the MHA’s written approval to move. Add: A transfer briefing is required. Transfer briefings are conducted once a month. |
| 10-10 | Initial PHA Role- Portability (Briefing)  The MHA will provide the name, address, and phone of the contact for the MHAs in the jurisdiction to which they wish to move. If there is more than one PHA with jurisdiction over the area to which the family wishes to move, the MHA will advise the family that the family selects the receiving PHA and notify the initial PHA of which receiving PHA was selected. The MHA will provide the family with contact information for all of the receiving PHAs that serve the area. | Initial PHA Role- Portability (Briefing)  Revise: The tenant will provide the name, address and phone number of the contact for the PHA in the jurisdiction to which they wish to move on the Portability request Form. If there is more than one PHA with jurisdiction over the area to which the family wishes to move, the MHA will inform the family and allow that the family to select the receiving PHA and notify the initial PHA of which receiving PHA was selected. The MHA will not provide any additional information about receiving PHAs in the area. The MHA will further inform the family that if the family prefers not to select the receiving PHA, the initial PHA will select the receiving PHA on behalf of the family. In this case, the MHA will not provide the family with information for all receiving PHAs in the area. |
| 10-10 | Initial PHA Role- Portability (Voucher Issuance and Term)  The initial term of the voucher will be 60 days. | Initial PHA Role- Portability (Voucher Issuance and Term)  The initial term of the voucher will be 120 days. |
| 10-11 | Initial PHA Role- Portability (Voucher Extensions and Expirations)  The MHA will approve **no** extensions to a voucher issued to an applicant or participant family porting out of the MHA’s jurisdiction except 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. | Initial PHA Role- Portability (Voucher Extensions and Expirations)  The MHA will approve no extensions to a voucher issued to an applicant or participant family porting out of the MHA’s jurisdiction. (Remove rest of exception verbiage below due to tenant receiving 120 days on voucher during port.) except 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. |
| 10-16 | Receiving PHA Role- Portability (Briefing)  The MHA will not require the family to attend a briefing. The PHA will provide the family with a briefing packet (as described in Chapter 5) and, in an individual briefing, will orally inform the family about the MHA’s payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process. The MHA will suggest that the family attend a full briefing at a later date. | Revise: The MHA will require the family to attend a briefing. MHA will provide the family with a briefing packet (as described in Chapter 5) and will inform the family of MHA’s payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process. |
| 10-16 | Income Eligibility and Reexamination  In conducting its own reexamination, the MHA will rely upon any verifications provided by the initial PHA to the extent that they (a) accurately reflect the family’s current circumstances and (b) were obtained within the last 120 days. | Income Eligibility and Reexamination  In conducting its own reexamination, the MHA will rely upon any verifications provided by the initial PHA to the extent that they (a) accurately reflect the family’s current circumstances and (b) were obtained within the last 60 days. |
| 10-19 | Ongoing Notification Responsibilities  The MHA will send a copy of the updated HUD-50058 by regular mail no later than 10 business days after the effective date of the reexamination. | Ongoing Notification Responsibilities  The MHA will send a copy of the updated HUD-50058 by email, and regular mail no later than 10 business days after the effective date of the reexamination. |
| 11-11 | Interim Reexaminations (Departure of a Family or Household Member)  If a household member ceases to reside in the unit, the family must inform the MHA within 10 business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent. | Interim Reexaminations (Departure of a Family or Household Member)  Revise: If a household member ceases to reside in the unit, the family must inform the MHA within 10 business days. If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill). This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent. |
| 11-13 | Processing the Interim Reexamination – Method of Reporting  The family may notify the PHA of changes either in writing. | Processing the Interim Reexamination – Method of Reporting  The family may notify the PHA of changes in writing or online. |
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| 4-9 | Add: Emergency Housing Vouchers (EHVs):  Emergency Housing Vouchers (hereafter EHV or EHVs) were granted under the American Plan Act of 2021. Families who are eligible for an EHV must be referred to MHA by the Continuum of Care. Direct referrals are not placed on the existing Housing Choice Voucher waitlists (PIH2021-15 p 24). If the number of direct referrals exceeds the number of EHVs available, MHA will establish a separate waitlist solely for EHV direct referrals (PIH2021-15 p 27).  Program Eligibility:  In order to be eligible for an EHV, an individual or family must meet one of the four eligibility categories (Notice PIH2021-15 p 16):  a. Homeless  b. At risk of homelessness  c. Fleeing, or attempting to flee, domestic violence dating violence, sexual assault, stalking, or human trafficking  d. Recently homeless and for whom providing rental assistance will prevent the family’s homelessness or having high risk of housing instability.  \*Eligibility is not limited to single persons. \*  Program Referrals:  Families who are eligible for an EHV must be referred to MHA by the Continuum of Care. Direct referrals are not placed on the existing Housing Choice Voucher waitlists (PIH2021-15 p 24).  Program Requirements:  a. Separate Waiting List  - The PHA shall maintain a separate waiting list for EHV referrals/applicants to assist with expediting the leasing process.  b. EHV families are subject to the same screening eligibility standards as HCV families.  c. Termination of Vouchers upon Turnover after September 30, 2023  - The ARP provides that after September 30, 2023, a PHA may not reissue the EHV when assistance for an assisted family end. 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. |  |
| 4-11 | 4-III.C. Selection Method  Local Preferences  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.  Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.  MHA Policy:  The MHA will use the following local preferences:  1. The MHA will offer a preference to any family that has been terminated from its MCV program due to insufficient program funding.  2. The MHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who have either been referred by a partnering service agency or consortia or is seeking an emergency transfer under VAWA from the MHA’s public housing program or other covered housing program operated by the MHA.  The applicant must certify that the abuser will not reside with the applicant unless the MHA gives prior written approval. | Revise: MHA Policy  The MHA will use the following local preferences:  1. The MHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.  2. The MHA will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, or stalking who have either been referred by a partnering service agency or consortia or is seeking an emergency transfer under VAWA from the MHA’s public housing program or other covered housing program operated by the MHA.  Add: 3. The preference will also include families or individuals who are homeless as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)), or at risk of homelessness, as defined in section 401(1) of such Act (U.S.C. 11360(1)). [Notice PIH 2022-29).  The applicant must certify that the abuser will not reside with the applicant unless the MHA gives prior written approval. |
| 4-12 | 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)].  MHA Policy:  Families will be selected from the waiting list based on lottery numbers that were assigned to each application.  Within each targeted funding or preference category, families will be selected according to lottery number assigned by the MHA. Documentation will be maintained by the MHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the MHA does not have to ask higher placed families each time targeted selections are made.  Families that qualify for a specific category of program funding (targeted funding) may be selected from the waiting list ahead of higher placed families that do not qualify for targeted funding. However, within any targeted funding category, applicants will be selected based on the lottery number assigned to each application, at the time the applications were placed on the waiting list. | Revise: MHA Policy  Families will be selected from the waiting list based on lottery numbers that were assigned to each application and the local preferences.  Within each targeted funding or preference category, families will be selected according to lottery number assigned by the MHA. Documentation will be maintained by the MHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the MHA does not have to ask higher placed families each time targeted selections are made. |