

# Public Housing

## Admission and Continued Occupancy Policy

### Summary of Changes

Following is a summary of significant changes to the Parma Public Housing Authority's (PPHA) Public Housing Admissions and Continued Occupancy Policy (ACOP). Recommended changes are based on PIH Notices, U.S. Department of Housing and Urban Development (HUD) guidance and PPHA requested updates.

A significant change is defined as one which changes policy or procedure. Language and grammatical changes are made to improve consistency, reduce duplication, and create an improved format. As these changes do not change policy or procedure they are not listed below. All changes have been provided in a "track changes" format Word document.

**I. Nondiscrimination; E. Equal Access Rule:** The Equal Access Rule requires HUD housing assistance programs be open to all eligible individuals regardless of sexual orientation, gender identity, or marital status.

**II. Eligibility for Admissions and Processing Applications:** As per HUD requirements, PPHA will take steps to ensure that notice for the opening and closing of the waiting list reaches eligible individuals with disabilities and those with limited-English proficiency. PPHA will reach out to persons with disabilities residing in institutions transitioning to community-based settings and those with limited-English proficiency. This may be accomplished by targeting social service agencies, nursing homes, psychiatric hospitals, mental health facilities, Money Follows the Person agencies, and Medicaid agencies.

**II. Eligibility for Admissions and Processing Applications; E. Processing Applications for Admission; 2.c. Reporting Homeless Status:** HUD requires PHA's to report homeless status on the 50058. PPHA will accept self-certification of homeless status.

**II. Eligibility for Admissions and Processing Applications; F. The Preference System; 3.b.** A local residency preference has been added. Applicant families that reside in Cuyahoga County, are working in Cuyahoga County or who have been notified they will be working in Cuyahoga County at the time of application will receive a preference. The residency preference will be administered in a manner that does not have the purpose or effect of delaying or otherwise denying admission to the program based on the race, color, gender, ethnic origin, religion, disability, marital status, gender identity, sexual orientation, or age of any member of the applicant family. PPHA will routinely conduct an analysis of need and will examine its' waiting list and participant demographics to determine if the preference has a disparate impact on a protected class. Applicants meeting one or more preferences will qualify as having met the preference criteria.

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**II. Eligibility for Admissions and Processing Applications; G. Screening Applicants for Admission; 1.h.** As per HUD requirements, PPHA will not deny admission for tenancy to a potential resident on the basis of the person having experienced a prior bedbug infestation or give a preference to an applicant that has not had a prior infestation.

**II. Eligibility for Admissions and Processing Applications; G. Screening Applicants for Admission; 2.h.** The PPHA will prohibit admission for a period of three (3) years after a disqualifying behavior or event.

**II. Eligibility for Admissions and Processing Applications; G. Screening Applicants for Admission; 4.** HUD requires that applicants provide a list of all States that any family member has resided in for purposes of ensuring no household member is on a Lifetime Sex Offender Registry. If a family member is denied due to criminal background they shall have the opportunity to dispute the report.

**II. Eligibility for Admissions and Processing Applications; G. Screening Applicants for Admission; 4.b.** PPHA will deny an applicant if they have been evicted from federally assisted housing within the previous five (5) years.

**II. Eligibility for Admissions and Processing Applications; H. Occupancy Guidelines; 1.g.** Policy states that a parent is not required to share a bedroom with his/her child. Language is added to clarify that an exception is a child under the age of two, regardless of gender, will not qualify for a separate bedroom as long as maximum occupancy guidelines are not exceeded.

**III. Tenant Selection and Assignment Plan; B. Making Unit Offers to Applicants; 4.** Policy is changed to allow an applicant seven (7) working days to accept the vacant unit offered.

**IV. Leasing Policies; C. Additions to the Household and Visitors; 9.** A household member over the age of 17, or an emancipated minor, that moves from the dwelling unit, may be readmitted as a household member if all eligibility criteria are met as long as maximum occupancy standards are not exceeded.

**VI. Eligibility for Continued Occupancy, Annual Reexaminations, and Remaining Family Members; A. Eligibility for Continued Occupancy; A.6.** Each adult household member will be screened for sexual offender lifetime registration status determined via use of the Dru Sojodin website at each annual review.

**VI. Eligibility for Continued Occupancy, Annual Reexaminations, and Remaining Family Members; E. Community Service Requirement.** PPHA will provide each family with a copy of the Community Service and Self-Sufficiency Requirement at initial application and secure a certification of receipt. Residents must sign a certification that they have read and received a copy of the Community Service and Self-Sufficiency Requirement and understand that if they are not exempt, failure to comply with the community service requirement will result in non-renewal of the lease.

**VIII. Lease Termination Procedures; E. Death of Single-Member Household;** Upon notification of the death, the family or designee for the deceased tenant's estate should be allotted a minimum of fourteen (14) consecutive days to remove personal belongings from the unit. While there is no HUD requirement for the time frame allotted for the family or designee to remove belongings, HUD recommends fourteen

(14) consecutive days starting the day after the date of notification unless there is local law that establishes more or less time and/or the rent for the month was paid prior to the date of death in which case the end of the month or fourteen (14) days should be allotted, whichever is greater.

**X. Rents/Flat Rents: A. Flat Rents;** Flat rent calculation methodology is updated to comply with Public Law 113-76, Fiscal Year 2014 Appropriations Act and PIH Notice 2015-13. HUD regulations are specific as to the setting of flat rents, calculation methods, and implementation schedules.

**XI. Pet Policy;** Policy has been updated to comply with Ohio Law and Fair Housing guidelines. Ohio Law states that any and all deposits collected greater than one month's rent must earn interest that incurs to the resident. In order to not collect a deposit greater than one month's rent the pet deposit is changed to a non-refundable pet fee. Language regarding reasonable accommodations has been removed from the section addressing "pets". A service or companion animal is not a pet and should not be referred to as a pet.

**XII. Definitions and Procedures to be used in Determining Income and Rent; B. Items Not Included in Annual Income; 18.** PPHA will accept self-certification of fully excluded income but may elevate verification requirements if needed to determine that the income is eligible for full exclusion. For partially excluded income PPHA will follow HUD-prescribed verification requirements.

**XIV. EIV Policy;** Language was added to summarize the information to be found in PIH Notice 2012-10 and PIH Notice 2012-4. The Notices discuss the Summary Report, the Deceased Tenant Report, and using EIV to verify SS and SSI benefits.

**XV. Privacy Protection;** Personally Identifiable Information is defined and notices which provide guidance for protection of the information are listed.

To compile the above changes, all PIH Notices were reviewed for years 2012, 2013, 2014, and 2015 to date. Notices were compared to Policy and recommended changes bring Policy into compliance, streamline PPHA operations, and ensure compliance with regulations.

Respectfully submitted by:

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