

Parma Public Housing Authority
Admissions and Continued Occupancy Policy
Summary of Changes

August 7, 2016

II. Eligibility for Admission and Processing of Applications: B. Qualifying for Admission

In the U.S. Department of Housing and Urban Development (HUD) Streamlining Administrative Regulations notice dated March 8, 2016, HUD addressed a previous regulation which treated the addition of a child under the age of six (6) to a household differently based on whether the household was an applicant or resident. The streamlining rule more closely aligns the requirements for applicants and residents. The new requirement as stated in the Admissions and Continued Occupancy Policy (ACOP) is: If a child under the age of six (6) years was added to the applicant's household within the six (6) month period prior to the household's date of admission, the applicant may become a resident so long as the required Social Security Number documentation is provided to the PHA within 90 calendar days from the effective date of admission. The PHA must grant an extension of one additional 90-day period if the PHA determines that the applicant's failure to comply was due to circumstances that could not reasonably have been foreseen and were outside the control of the assistance applicant. If the applicant family fails to produce the documentation required within the required time period the PHA terminates program participation according to 24 CFR 5.218.

II. Eligibility for Admission and Processing of Applications: E. Processing Applications for Admission

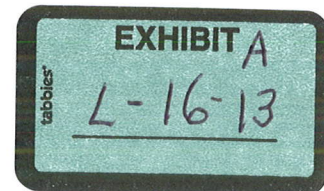
In section a.vi., added language referencing the new requirement regarding children under age six (6) that were added to a household within six (6) months of admission.

Removed a.i., a.ii., a.iii., and c. as they were duplicative.

III. Tenant Selection and Assignment Plan: B. Making Unit Offers to Applicants

The following language was added regarding income targeting requirements:

As per HUD requirements, not less than 40 percent of the units that become available during each PHA fiscal year must be made available for occupancy to extremely low-income families. If the income targeting requirement is not being met, then an extremely low-income family may be offered a unit before a non-extremely low-income family even if the non-extremely low-income family is a higher ranking applicant.



VI. Eligibility for Continued Occupancy, Annual Reexaminations, and Remaining Family Members: C. Reexaminations

For a family that has net assets equal to or less than \$5,000.00, the initial verification of assets must be third-party verified. The PHA will obtain third-party documentation of assets for reexaminations every three (3) years. For reexaminations in years one (1) and (2) the PHA will accept self-declaration. The declaration must state the amount of income the family expects to receive from such assets, this amount is included in the family's income.

VI. Eligibility for Continued Occupancy, Annual Reexaminations, and Remaining Family Members: E. Community Service Requirement

As per the streamlining administrative regulation, PHAs may allow families to self-certify to have performed the required qualifying activities for community service. A PHA may allow this as long as a random sample of self-certifications are verified each year. The following language was added to the ACOP:

Documentation shall include a signed certification from the family member that he/she has performed the qualifying activities. The certification must include a statement of the number of hours that the tenant contributed of community service and that this statement is subject to perjury, the name, address, phone number, and contact person for the community service provider, the dates during which the activity was completed, a description of the activity completed, and a certification that the tenant's statement is true. The tenant may choose to provide written verification by a third party and include the residents' name and address, the dates and number of hours of service performed, and certification by the third party that the service was performed in compliance with the Community Service requirement. If the resident performs their qualified activities through more than one community service organization, a separate certification is needed for each organization. PPHA may accept a self-certification from a resident at the end of the lease cycle which begins after implementation of this policy.

The PHA must validate through third-party verification procedures, a statistically valid, random sample of self-certifications each year to assure resident compliance (See PIH Notice 2016-06 Attachment D for sample size methodology). The PHA must choose a point-in-time annually to calculate the universe of self-certifications received over the previous 12 months. To validate a self-certification, third-party documentation must include the name of the organization or person, the number of hours completed by the resident, a signature from the appropriate staff person within the organization and that staff person's contact information. Tenants must be notified that any self-certification is subject to validation.

In the event the PHA determines that a self-certification was fraudulent, the PHA must provide notice to the resident of noncompliance pursuant to 24 CFR 960.607. The resident must sign an agreement with the PHA to come into compliance. If the resident refuses, termination procedures must begin pursuant to PIH Notice 2015-12.

Language was also added to clarify that the PHA will notify the resident of their ability to self-certify. Also, language was added that if it is found that a family has not met its community service

requirement and must enter into an agreement to complete said hours, self-certification will not be an acceptable source of documentation.

VIII. Lease Termination Procedures: A. General Policy Lease Terminations

Previously, regulations required the PHA to consult resident organizations prior to appointing a hearing officer. This requirement has been eliminated however in order for residents to have input into the selection process, policies regarding the selection process for the hearing officer shall be included in the tenant lease form. Changes to the tenant lease form are subject to a 30-day comment period.

VIII. Lease Termination Procedures: C. Recordkeeping Requirements

The streamlining administrative regulation eliminates the requirement that PHAs retain a redacted copy of each hearing decision to be made available to prospective complainants. Instead, the PHA is required to maintain a log of hearing officer decisions. Language has been added to formalize the procedure to maintain a log.

X. Rents/Flat Rents: A. Flat Rents

The following language was added as per the streamlining administrative regulations:

For Mixed Families the PHA shall prorate the families assistance as follows:

Step 1: Determine the Total Tenant Payment (TTP) in accordance with §5.628 (includes income of all family members including those that have not established eligible immigration status).

Step 2: Subtract the TTP from the PHA-established flat rent applicable to the unit. The result is the maximum subsidy the family could qualify for if all family members were eligible.

Step 3: Divide the maximum subsidy by the total persons in the family. This is the member maximum subsidy.

Step 4: Multiply the member maximum subsidy by the number of family members that are citizens or have eligible immigration status.

The product of Steps 1-4 is the maximum amount of subsidy the family is eligible. The family's rent is the PHA-established flat rent minus the amount of the eligible subsidy.

When the Mixed Family's TTP is greater than the PHA-established flat rent, the PHA subtracts from the Mixed Family TTP and established utility allowance, and the sum becomes the mixed family rent.

XI. Definitions and Procedures to be Used in Determining Income and Rent: B. Items not Included in Annual Income

As per the streamlining administrative regulations, the definition of tuition was expanded to include fees and special charges.

XI. Definitions and Procedures to be Used in Determining Income and Rent: B. Items not

Included in Annual Income

As part of HUD's streamlining administrative regulations, changes were made to the Earned Income Disallowance rule. Specifically, PHA's are no longer required to track employment stop and starts once the initial disallowance begins. As such, the disallowance is applied for 24 consecutive months regardless of loss of employment and the 48 month maximum rule does not apply. The ACOP was updated to remove the requirement to track the stopping and starting of employment after the disallowance period begins. Language was added to clarify the need to document when the second 12 month 50% disallowance period begins. Finally, the 48 month disallowance timeframe was changed to 24 months.

XIII. Family Debts to the PPHA: A. Payment Agreement for Families

The terms of the Repayment Agreement were changed as follows:

Families who commit program fraud or untimely reporting of increases in income will, at the PPHA's discretion, be offered a repayment agreement with the terms of one-third down and payment in full as described below:

Amount Owed	Down Payment	Term of Repayment
\$0.00-\$1,500.99	1/3 of the Amount Owed	3 months
\$1,501.00 and greater	1/3 of the Amount Owed	6-12 months

If the family's repayment agreement is in arrears and the family has not contacted or made arrangements with the PHA, the PHA may:

- Require the family to pay the balance in full
- Pursue civil collection of the balance due
- Terminate the Lease Agreement
- Grant an extension of 10 business days

A payment will be considered to be in arrears if the payment has not been received by the close of the business day on which the payment was due. If the due date is on a weekend or holiday, the due date will be at the close of the next business day.

A payment agreement will be considered to be in default when it is in arrears for ten (10) days.

If the family's repayment agreement is in arrears and the family has not contacted or made arrangements with the PHA, the PHA may:

- Require the family to pay the balance in full
- Pursue civil collection of the balance due
- Terminate the Lease Agreement
- Grant an extension of 10 business days