

Attachment B

List of Proposed Discretionary Revisions to the 2016 Administrative Plan

Santa Monica Housing Authority (SMHA)

Original Proposed Revisions are in **GREEN**, and updated revisions are marked in **BLUE**

Chapter 1

Section	1-I.D. THE PHA’S PROGRAMS
Current	<u>PHA Policy</u> The PHA’s administrative plan is applicable to the operation of the Housing Choice Voucher program [including the Family Self Sufficiency (FSS) program], Continuum of Care programs, HOME, and CDBG programs.
Proposed	MODIFY <u>PHA Policy</u> The PHA’s administrative plan is applicable to the operation of the Housing Choice Voucher program [including the Family Self Sufficiency (FSS) program], Continuum of Care programs, and CDBG programs. Policies for the HOME and Affordable Housing Production and Preservation Program will refer to this Administrative Plan.
Section	1-III.D. UPDATING AND REVISING THE PLAN (Pg 1-12)
Current	NO EXISTING LANGUAGE
Proposed	ADD <u>PHA Policy</u> The Plan will become effective the date it is approved by City Council.

Chapter 3

Section	Eligibility 3-I.F. DEPENDENT [24 CFR 5.603] PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS
Current	<u>PHA Policy</u> Joint Custody of Dependents Dependents who are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more than 50% of the time. When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, IRS returns showing which family has claimed the child for income tax purposes, and school records.

Proposed	<p>MODIFY <u>PHA Policy</u></p> <p>Joint Custody of Dependents</p> <p>Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more than 50% of the time. The PHA considers joint custody to be legal only where by a court order exists determining primary place of residence of children.</p> <p>If the dependent(s) resides in two households, each of which have a housing subsidy, the addition of said dependent(s) will create a Multiple Subsidy error and is not approved without the household submitting a request to the PHA. Failure to report the existence of duplicate housing subsidy assistance is a violation of Family Obligations.</p> <p>The PHA must then, upon approval of the request, submit a waiver request to the local field office. If the local field office approves the request, it will be forwarded to HUD for final approval.</p> <p>When appropriate, the Housing Authorities involved may remove the name of the dependent(s) as they change households during the year.</p> <p>When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents and receive the dependent allowance/deduction. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, IRS returns showing which family has claimed the child for income tax purposes, and school records.</p>
Section	Chapter 3-III.C
Current	<p><u>PHA Policy</u></p> <p>Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence.</p>
Proposed	<p>MODIFY <u>PHA Policy</u></p> <p>Abusive or violent behavior towards PHA personnel or owner/agent includes verbal as well as physical abuse or violence.</p>

Chapter 4

Section	4-I.D. PLACEMENT ON THE WAITING LIST
Current	<p><u>PHA Policy</u></p> <p>Eligible for Placement on the Waiting List</p> <p>Waitlist applicant will receive instant confirmation of acceptance when all required information is completed. A final determination of eligibility will be made when the family is selected from the waiting list.</p> <p>Once the application has been accepted, a receipt will be displayed with instructions on how to check the wait list status.</p> <p>Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA.</p>
Proposed	<p>MODIFY</p> <p><u>PHA Policy</u></p> <p>Eligible for Placement on the Waiting List</p> <p>Waitlist applicant will receive instant confirmation of receipt of application when all required information is completed. A final determination of eligibility will be made when the family is selected from the wait list.</p> <p>Once the application has been accepted, a receipt will be displayed with instructions on how to use Assistance Check to check the wait list status and update household information.</p> <p>When the application period is over, the PHA will conduct a lottery and select 500 applications. Those 500 applicants will then be placed on the wait list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA. The status of the applications will be available 10 business days after the close of the application intake period online only, via the Assistance Check website. Reasonable accommodation requests regarding computer access can be made to the PHA.</p> <p>Applicants that are not selected via the random lottery process are not entitled to an informal review.</p>

Section	4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]
Current	<p><u>PHA Policy</u></p> <p>The PHA has one waiting list which it operates for affordable housing, including the HCV, PBV and inclusionary housing programs.</p>
Proposed	<p>MODIFY <u>PHA Policy</u></p> <p>The PHA has a wait list which it operates for the HCV and PBV programs, and individual wait lists for inclusionary housing (Affordable Housing Production Program), Continuum of Care, and HOME programs. The waitlist for AHPP is always open for applications.</p>
Section	4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]
Current	<p><u>PHA Policy</u></p> <p>The PHA will close the waiting list when the estimated waiting period for housing assistance reaches 12 months. Where the PHA has particular preferences or funding criteria that require a specific category of family, such as homeless or project-based voucher (PBV), the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.</p>
Proposed	<p>MODIFY <u>PHA Policy</u></p> <p>The PHA will close the waiting list when it has an adequate pool of families to use the available assistance. Where the PHA has particular preferences or funding criteria that require a specific category of family, such as homeless or project-based voucher (PBV), the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.</p>
Section	4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES
Current	<p><u>PHA Policy</u></p> <p>The family will not be permitted to report changes in household size or composition (add new household members not included on the family's pre-application) after the family has been selected from the waiting list, except:</p>
Proposed	<p>MODIFY <u>PHA Policy</u></p> <p>The family will not be permitted to report changes in household size or composition (add new household members not included on the family's pre-application) after the family has received notification of being selected from the waiting list, except:</p>

Section	4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES
Current	<p><u>PHA Policy</u></p> <p>While the family is on the waiting list, the family must immediately inform the SMHA of changes in income and contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing within fifteen (15) calendar days of the date of the change using instructions detailed on the Waitlist Check website.</p>
Proposed	<p>MODIFY</p> <p><u>PHA Policy</u></p> <p>While the family is on the waiting list, the family must immediately inform the SMHA of changes in income and contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing within fifteen (15) calendar days of the date of the change online only using the Assistance Check website.</p>
Section	4-III B. Selection and HCV Funding Sources
Current	<p><u>PHA Policy</u></p> <p>The PHA administers the following types of targeted funding:</p> <p>Continuum of Care and HOME Programs</p> <p>A separate waiting list will be maintained for the Special Needs Housing Programs, which include the Continuum of Care Program and HOME Program. Applicants for these programs must meet additional, specific, eligibility requirements. For most targeted programs, applicants are referred by agencies that provide services to the targeted population. Referrals/applications will be placed on the waiting list with the date and time of receipt noted.</p> <p>When a special voucher becomes available, a family will be selected from the list. After the family is determined eligible to receive a voucher, the family will be admitted to participate in the program in accordance with HUD regulations and other requirements, and with policies stated in the PHA Administrative Plan.</p> <p>The PHA’s Special Needs Programs waiting list is open and will accept referrals/applications until further notice.</p> <p>(Please refer to Chapter 18 for additional details on Special Needs Housing Programs)</p>

<p>Proposed</p>	<p>MODIFY <u>PHA Policy</u></p> <p>The PHA administers the following types of targeted funding: Continuum of Care and HOME Programs</p> <p><i>Separate waiting lists</i> will be maintained for Special Needs Housing Programs. <i>The Continuum of Care Program and HOME Program will have separate waiting lists.</i> Applicants for these programs must meet additional, specific, eligibility requirements. For most targeted programs, applicants are referred by agencies that provide services to the targeted population. Referrals/applications will be placed on the waiting list with the date and time of receipt noted.</p> <p>When a special voucher becomes available, a family will be selected from the list. After the family is determined eligible to receive a voucher, the family will be admitted to participate in the program in accordance with HUD regulations and other requirements, and with policies stated in the PHA Plan.</p> <p>The PHA’s <i>Targeted Funding</i> Programs waiting list is open and will accept referrals/applications until further notice.</p> <p>(Please refer to Chapter 19 for additional details on the <i>Continuum of Care program</i>)</p> <p><i>Applicants for the AHPP will be permitted to apply at any time. Income targets for the available apartments are higher than any other programs. Applicants who are over income for COC, HOME, and Section 8 will be referred to the AHPP wait list.</i></p>
<p>Section</p>	<p>4-III.C. SELECTION METHOD Local Preferences [24 CFR 982.207; HCV p. 4-16]</p>
<p>Current</p>	<p><u>PHA Policy</u></p> <p><u>Tier 1:</u></p> <ul style="list-style-type: none"> o Displaced Preference: Involuntarily displaced applicants are applicants who have or will (within twelve months from the date of verification) be required to vacate housing in the City of Santa Monica as a result of: <ul style="list-style-type: none"> <input type="checkbox"/> A disaster (fire, flood, earthquake, etc.) that occurred through no fault of the applicant, or <input type="checkbox"/> Federal, state or local government action related to code enforcement, public improvement or development, or <input type="checkbox"/> An eviction pursuant to the Ellis Act or Civil Code section 798.56(g) of the Mobile Home Residency Law. <input type="checkbox"/> Owner/relative occupancy evictions from rent controlled units under Section 1806(a)(8) of the Santa Monica Rent Control Amendment and under Santa Monica City Charter, Article XVIII, Section 2304(c)(8).

In order to receive the preference as Displaced, applicants who have been displaced must not be living in “standard, permanent replacement housing”.

Standard replacement housing is defined as housing that is decent, safe and sanitary (according to HUD HQS), that is adequate for the family size (according to HUD HQS) and that the family is occupying pursuant to a lease or occupancy agreement. Minor HQS violations that are few in a number do not disqualify replacement housing. Standard replacement housing does not include transient facilities, hotels, motels, or temporary shelters.

Households who receive a displaced preference, who have had an actual loss of their unit, will be given highest preference. For example, households who have been physically displaced from their unit as the result of a non-tenant caused fire or flood will be given the highest preference.

- o Termination Resulting From Funding Shortfalls: Families that have been terminated from the PHA’s HCV program due to insufficient program funding and are at greatest risk of homelessness.
- o The PHA may prioritize a limited number of vouchers for Continuum of Care program participants who are stable and no longer require service participation to prevent them from recycling into homeless. This will allow the community to serve more homeless families and better utilize services for those most in need. No more than 10% vouchers will be utilized annually if available.

The wait list for tier 1 applicants shall remain open at all times.

Tier 2:

Live/Work Preference:

- o Live Preference:
 - Applicants who are residents of the City of Santa Monica.
 - Chronically Homeless applicants on the service registry who became homeless in Santa Monica.
- o Work Preference:
 - Applicants who are not residents of the City of Santa Monica who are working a minimum of 36 hours per week (or hired to work a minimum of 36 hours per week) in the City of Santa Monica (Applicants who work for a temporary agency located outside of the City of Santa Monica who do not live in Santa Monica do not qualify for preference if they are on a temporary assignment).
 - Applicants who are in approved job training in Santa Monica or persons who were previously in the Santa Monica workforce but are now receiving unemployment, worker’s compensation, vocational

	<p>rehabilitation benefits, disability benefits, or retirement benefits.</p> <p><u>Tier 3:</u></p> <ul style="list-style-type: none"> ○ Families who do not live or work in the City of Santa Monica <p><u>Order of Selection Within Tiers:</u></p> <ul style="list-style-type: none"> ● Non-Subsidized Households
Proposed	<p>ADD</p> <p><u>PHA Policy</u></p> <p><u>Tier 1:</u></p> <ul style="list-style-type: none"> ○ Displaced Preference: Involuntarily displaced applicants are applicants who have or will (within twelve months from the date of verification) be required to vacate housing in the City of Santa Monica as a result of: <ul style="list-style-type: none"> <input type="checkbox"/> A disaster (fire, flood, earthquake, etc.) that occurred through no fault of the applicant, or <input type="checkbox"/> Federal, state or local government action related to code enforcement, public improvement or development, or <input type="checkbox"/> An eviction pursuant to the Ellis Act or Civil Code section 798.56(g) of the Mobile Home Residency Law, or <input type="checkbox"/> Owner/relative occupancy evictions from rent controlled units under Section 1806(a)(8) of the Santa Monica Rent Control Amendment and under Santa Monica City Charter, Article XVIII, Section 2304(c)(8) , or <input type="checkbox"/> Displacement from another federal housing program and displaced from that program for reasons beyond their control or because they did not participate in a home ownership program, or <input type="checkbox"/> Domestic Violence. Applications from victims of domestic violence/familial abuse, sexual assault or stalking, who have been displaced in the City of Santa Monica as a result of the victimization. Supporting documentation shall be in accordance with the guidelines in Chapter 16 Section XI. D of this Plan. <p>In order to receive the preference as Displaced, applicants who have been displaced in the previous 12-month period must not be living in “standard, permanent replacement housing”.</p> <p>Standard replacement housing is defined as housing that is decent, safe and sanitary (according to HUD HQS), that is adequate for the family size (according to HUD HQS) and that the family is occupying pursuant to a lease or occupancy agreement. Minor HQS violations that are few in a number do not disqualify replacement housing. Standard replacement housing does not include transient facilities, hotels, motels, or temporary shelters.</p>

Households who receive a displaced preference, who have had an actual loss of their unit, will be given highest preference. For example, households who have been physically displaced from their unit as the result of a non-tenant caused fire or flood will be given the highest preference.

- o Termination Resulting From Funding Shortfalls: Families that have been terminated from the PHA’s HCV program due to insufficient program funding and are at greatest risk of homelessness.
- o The PHA may prioritize a limited number of **Section 8 Housing Choice** vouchers for Continuum of Care program participants who are stable and no longer require service participation to prevent them from recycling into homeless. This will allow the community to serve more homeless families and better utilize supportive services for those most in need. No more than 10% vouchers will be utilized annually if available.

The wait list for tier 1 applicants shall remain open at all times.

Tier 2:

Live/Work Preference:

- o Live Preference:
 - Applicants who are residents of the City of Santa Monica.
 - Chronically Homeless applicants on the service registry who became homeless in Santa Monica.
- o Work Preference:
 - Applicants who are not residents of the City of Santa Monica who are working a minimum of 36 hours per week (or hired to work a minimum of 36 hours per week) in the City of Santa Monica (Applicants who work for a temporary agency located outside of the City of Santa Monica who do not live in Santa Monica do not qualify for preference if they are on a temporary assignment).
 - Applicants who are in approved job training in Santa Monica or persons who were **immediately** previously in the Santa Monica workforce but are now receiving unemployment, worker’s compensation, vocational rehabilitation benefits, disability benefits, or retirement benefits from Santa Monica.

Tier 3:

- o Families who do not live or work in the City of Santa Monica

Order of Selection Within Tiers:

Non-Subsidized Households and Rent Burdened Households

- A Rent Burdened Household is one that pays more than 50 percent of their gross annual income toward their rent

Section	4-III.C. SELECTION METHOD
Current	<p><u>PHA Policy</u></p> <p><u>Order of Selection</u></p> <p>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)]</p> <ul style="list-style-type: none"> • Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA’s hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA 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 PHA does not have to ask higher placed families each time targeted selections are made. • Preference Denial: If the PHA denies an applicant’s preference claim, the PHA shall return the applicant to the waiting list and will notify the applicant in writing of the reasons for the denial. If the applicant fraudulently claimed the preference (i.e., by falsifying documents), the application is denied and removed from the waiting list. The notice shall advise the applicant of their right to contest denial of preference (informal review).

Proposed	<p>MODIFY <u>PHA Policy</u></p> <p><u>Order of Selection</u> 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)].</p> <p>Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA’s hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA 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 PHA does not have to ask higher placed families each time targeted selections are made.</p> <p>Preference Denial: If the PHA denies an applicant’s preference claim, the PHA shall return the applicant to the waiting list and will notify the applicant in writing of the reasons for the denial. If the applicant fraudulently claimed the preference (i.e., by falsifying documents), the application is denied and removed from the waiting list. The notice shall advise the applicant of their right to contest denial of preference (informal review).</p> <p>[This will be removed because targeted funding waitlists are separate and all applicants must be allowed to apply to any/all open waitlists. Targeted funding waitlists will remain open while funding is available. Documentation is not necessary.]</p>
Section	4-III.C. SELECTION METHOD
Current	<p><u>PHA Policy</u> Income Targeting Requirement [24 CFR 982.201(b)(2)] Moderate income families will be selected from the waitlist in order of date and time of their application.</p>
Proposed	<p>MODIFY <u>PHA Policy</u> Income Targeting Requirement [24 CFR 982.201(b)(2)] Moderate income applicants will be selected from the separate inclusionary housing wait list that is continually open, based on date and time of their application.</p>

Section	4-III.D. NOTIFICATION OF SELECTION
Current	<p data-bbox="358 191 1432 231"><u>PHA Policy</u></p> <p data-bbox="358 231 1432 315">When a family has been selected from the waiting list, the PHA must notify the family [24 CFR 982.554(a)].</p> <p data-bbox="358 315 1432 441">The PHA will notify the family by first class mail when it is selected from the waiting list. The notice, instructions and application packet will inform the family of the following:</p> <p data-bbox="358 441 1432 567">Family must complete the application form and provide required documentation by the date specified in the notice, or the family will be removed from the waiting list.</p> <p data-bbox="358 567 1432 651">The PHA will notify the family by first class mail when the preliminary review is completed. The notice will inform the family of the following:</p> <p data-bbox="358 651 1432 735">Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview</p> <p data-bbox="358 735 1432 1020">If a notification letter is returned to the PHA by the post office, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family’s address of record, as well as to any known alternate address. In accordance with SMHA’s LEP Plan, SMHA will include a translated statement for LEP applicants in the selection notification packet; this statement will notify LEP applicants of the availability of translated materials and additional language assistance.</p>

Proposed	<p>MODIFY PHA Policy</p> <p>When a family has been selected from the waiting list, the PHA must notify the family [24 CFR 982.554(a)].</p> <p>The PHA will notify the family by email when it is selected from the waiting list. The notice, instructions and application packet will inform the family of the following:</p> <p>Family must complete the application form and provide required documentation by the date specified in the notice, or the family will be removed from the waiting list.</p> <p>The PHA will notify the family by email when the preliminary review is completed. The notice will inform the family of the following:</p> <p>Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview</p> <p>If a notification email is returned to the PHA after two attempts are returned as undeliverable at that specific address, the family will be removed from the wait list. A notice of denial (see Chapter 3) will be sent to the family’s address of record, as well as to any known alternate address. In instances where the household certifies that email is not an option, the PHA will mail notifications to the household. If a notification is returned as undeliverable at that address, the family will be removed from the wait list. In accordance with SMHA’s LEP Plan, SMHA will include a translated statement for LEP applicants in the selection notification packet; this statement will notify LEP applicants of the availability of translated materials and additional language assistance.</p>
Section	<p>4-III.C. SELECTION METHOD Local Preferences and EXHIBIT 4-1: SMHA’S WAITING LIST & HIERARCHY OF PREFERENCES</p>
Current	<p>NO EXISTING LANGUAGE</p>
Proposed	<p>ADD PHA Policy</p> <p>Order of Selection within Tiers:</p> <p><u>Non-Subsidized Households and Rent Burdened Households</u></p> <ul style="list-style-type: none"> o A Rent Burdened Household is one that pays more than 50% of their gross annual income towards their rent

Chapter 5

Section	5-I.B. BRIEFING [24 CFR 982.301] Briefing Packet [24 CFR 982.301(b)] Additional Items to be Included in the Briefing Packet
Current	NO EXISTING LANGUAGE
Proposed	ADD <u>PHA Policy</u> Reminder to family that it is mandatory that the household report any changes in Household Income (for all household members 18 and older) in writing within 10 business days. This reminder shall detail information about income discrepancies and the Income Verification system used by the PHA.
Section	BRIEFINGS AND VOUCHER ISSUANCE 5-I.C. FAMILY OBLIGATIONS
Current	NO EXISTING LANGUAGE
Proposed	MODIFY <u>PHA Policy</u>

Chapter 6

Section	6-I.B. HOUSEHOLD COMPOSITION AND INCOME
Current	<p><u>PHA Policy</u></p> <p>Joint Custody of Dependents When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes, or school/childcare records.</p>
Proposed	<p>ADD</p> <p><u>PHA Policy</u> Joint Custody of Dependents</p> <p>When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents and receive the dependent allowance/deduction. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes, or school/childcare records.</p>
Section	INCOME AND SUBSIDY DETERMINATIONS
	PART III: CALCULATING FAMILY SHARE AND PHA SUBSIDY
	6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505]
Current	<p><u>PHA Policy</u></p> <p><i>Changes in Family Unit Size</i></p> <p>Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family’s first regular reexamination following the change in family unit size.</p>
Proposed	<p>MODIFY</p> <p><u>PHA Policy</u></p> <p><i>Changes in Family Unit Size</i></p> <p>Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the contract term, the new family unit size must be used to determine the payment standard for the family in accordance with Chapter 5 Part II of this plan.</p>
Section	6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505]
Current	NO EXISTING LANGUAGE
Proposed	<p>ADD</p> <p><u>PHA Policy</u></p> <p>For Deed Restricted Affordable Housing Payment Standard information, see Chapter 16 II B.</p>

Chapter 8

Section	8-I.D. OWNER AND FAMILY RESPONSIBILITIES [24 CFR 982.404]
Current	NO EXISTING LANGUAGE
Proposed	ADD <u>PHA Policy</u> The family is responsible to notify the owner in writing of any/all items needing repair in the apartment or other issues related to damage or inoperability in the apartment, whether they are tenant caused or the result of normal wear and tear.
Section	PART II: THE INSPECTION PROCESS
Current	<u>PHA Policy</u> Notice and Scheduling
Proposed	ADD <u>PHA Policy</u> Notice and Scheduling Any required notices sent by the PHA will be addressed to the Head of Household, and must be deliverable to the address of the subsidized apartment.
Section	PART III: RENT REASONABLENESS [24 CFR 982.507] 8-III.D. PHA RENT REASONABLENESS METHODOLOGY
Current	<u>PHA Policy</u> How Rents Are Determined Owners may not request rent adjustments in the Voucher program prior to the end of the first year of the Lease. After that date, rent increases as permitted by the lease are effective with a 60-day notice to the family following PHA approval of the proposed increase. Landlords may not request more than one increase in a 12-month period. Annual Adjustments are determined by Santa Monica Rent Control Department annual percentage adjustments. The PHA disapproves rents that are not reasonable.

Proposed	<p>MODIFY <u>PHA Policy</u> How Rents Are Determined</p> <p>Owners may not request rent adjustments in the Voucher program prior to the end of the first year of the Lease. After that date, rent increases as permitted by the lease are effective with a 60-day notice to the family following PHA approval of the proposed increase. Rent increase requests shall be timed with a tenant’s annual re-examination. Landlords may not request more than one increase in a 12-month period. Annual Adjustments are determined by Santa Monica Rent Control Department annual percentage adjustments only; the PHA does not approve the addition of surcharges or pass through fees. The PHA disapproves rents that are not reasonable. General adjustments are approved on an annual basis if funding is available.</p>
Section	8-II.E. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); HCV GB, p. 10-32]
Current	<p><u>PHA Policy</u> The unit sample must include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.</p>
Proposed	<p>MODIFY <u>PHA Policy</u> The unit sample must include only units that have been inspected within the preceding month. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.</p>
Section	8-III.D. PHA RENT REASONABLENESS METHODOLOGY
Current	<p><u>PHA Policy</u> How Rents Are Determined</p> <p>The rent for a unit proposed for assistance will be compared to the rent charged for comparable units in the same market area. The PHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for assistance, the PHA may make adjustments to the range of prices to account for these differences.</p>
Proposed	<p>MODIFY <u>PHA Policy</u> How Rents Are Determined</p> <p>The rent for a unit proposed for assistance will be compared to the rent charged for three comparable units in the same market area. The PHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for assistance, the PHA may make adjustments to the range of prices to account for these differences.</p>

Chapter 11

Section	11-I.B. SCHEDULING ANNUAL REEXAMINATIONS Notification of and Participation in the Annual Reexamination Process
Current	NO EXISTING POLICY
Proposed	ADD <u>PHA POLICY</u> Any required notices sent by the PHA will be addressed to the Head of Household, and must be deliverable to the address of the assisted residence.
Section	REEXAMINATIONS PART II: INTERIM REEXAMINATIONS [24 CFR 982.516]
Current	New Family and Household Members Requiring Approval <u>PHA Policy</u> The PHA will not approve the addition of a new household member unless they are a spouse or partner, a child through birth, custody, adoption, or foster, or a household member who is added at the time the applicant family is selected from the waitlist.
Proposed	MODIFY New Family and Household Members Requiring Approval <u>PHA Policy</u> The PHA will not approve the addition of a new household member unless they are a spouse or partner, a child through birth, custody, adoption, or foster, or a household member who is added at the time the applicant family receives notification that they have been selected from the waitlist.
Section	11-III.D. DISCREPANCIES
Current	NO EXISTING LANGUAGE
Proposed	ADD <u>PHA Policy</u> Any overpayments resulting from the family's failure to report income will be resolved in accordance with Repayment Agreement policies in Chapter 16.

Chapter 14

Section	14-II.B. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE
Current	Family Reimbursement to PHA [HCV GB pp. 22-12 to 22-13] <u>PHA Policy</u> In the case of family-caused errors or program abuse, the family will be required to repay any excess subsidy received. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, the PHA will terminate the family's assistance in accordance with the policies in Chapter 12.
Proposed	MODIFY Family Reimbursement to PHA [HCV GB pp. 22-12 to 22-13] <u>PHA Policy</u> In the case of family-caused errors or program abuse, the family will be required to repay any excess subsidy received. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, or creates more than two overpayments in 36 months by failing to report income , the PHA will terminate the family's assistance in accordance with the policies in Chapter 12.

Chapter 16

Section	16-II.B. PAYMENT STANDARDS [24 CFR 982.503; HCV GB, Chapter 7]
Current	<p><u>PHA Policy</u> The payment standard sets the maximum subsidy payment a family can receive from the PHA each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of rents in the market area. The PHA must establish a payment standard schedule that establishes payment standard amounts for each FMR area within the PHA’s jurisdiction, and for each unit size within each of the FMR areas. For each unit size, the PHA may establish a single payment standard amount for the whole FMR area, or may set different payment standards for different parts of the FMR area. Unless HUD grants an exception, the PHA is required to establish a payment standard within a “basic range” established by HUD – between 90 and 110 percent of the published FMR for each unit size.</p>
Proposed	<p>ADD <u>PHA Policy</u> Payment Standards for Deed Restricted affordable apartments in Santa Monica are created either through a City Housing Trust Fund loan or grant to purchase and renovate or to develop for new constructed affordable housing. Apartments are income and rent restricted for a period of 55-years. Frequently these apartments are created by non-profit organizations using other funding sources from state, federal, or other sources. Alternatively, deed restricted apartments are also created through development agreements where a developer has offered a community benefit (housing, parks, etc..) in exchange for a development benefit. A covenant is recorded on the property title that the developer agrees to provide a portion of the apartments as deed restricted and affordable for 55-years. The restriction limits income targets and rent amounts. Each deed restriction may vary slightly and as standards have changed, so have the restrictions. Effective upon the recertification of each tenant which occurs after the adoption of the Administrative Plan the following policy applies:</p> <ul style="list-style-type: none"> a. All 0, 1, 2, and 3 bedroom apartments which target 30, 50, and 60 percent of Area Median Income (AMI) will be standardized based on the 2016 Los Angeles/Glendale Fair Market Rent as established by HUD by bedroom size. b. All 0, 1, 2, and 3 bedroom apartments which target 80 percent of AMI and above will be standardized at the current Exception Payment Standard by bedroom size. <p>The Housing Authority will seek a waiver from the U.S Department of Housing and Urban Development regarding the current Exception Payment Standard, to request that the payment standard for deed-restricted housing be equal to the lesser of the rent limit established by the recorded deed-restriction or the Exception Payment Standard. This policy would become effective with the next tenant recertification process.</p>

Section	16-IV.B. REPAYMENT POLICY
Current	<p><u>PHA Policy</u> Family Debts to the PHA</p> <p>Any amount owed to the PHA by a family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.</p> <p>If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate assistance in accordance with the policies in Chapter 12 and pursue other modes of collection.</p> <p>PHA may allow deferral of debt payment in situations where reasonable accommodation, loss of income, or circumstances beyond the family’s control merit the deferral. Debt deferral will be allowed only one time during the duration of that debt.</p> <p>PHA will deny eligibility to a family who has indebtedness to PHA or any other PHA until the balance is paid in full. Families who have indebtedness to PHA or any other PHA will be denied portability until the balance is paid in full.</p>
Proposed	<p>MODIFY <u>PHA Policy</u> Family Debts to the PHA</p> <p>Any amount owed to the PHA by a family must be repaid by the family. If the family indicates it is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.</p> <p>If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate assistance in accordance with the policies in Chapter 12 and pursue other modes of collection.</p> <p>PHA may allow deferral of debt payment in situations where reasonable accommodation, loss of income, or circumstances beyond the family’s control merit the deferral. Debt deferral will be allowed only one time during the duration of that debt.</p> <p>PHA will deny eligibility to a family who has indebtedness to PHA or any other PHA until the balance is paid in full. Families who have indebtedness to PHA or any other PHA will be denied portability until the balance is paid in full.</p> <p>Repeated occurrences of unreported income by a family is grounds for termination. The PHA will terminate assistance after the second occurrence of unreported income by the family in 36 months.</p> <p>The PHA receives monthly reports from a federal income verification system, which often is the source of discrepancy notifications. This system uses Social Security numbers to verify valid employment. Information about the system is included in the family’s briefing packet.</p>

Section	Repayment Agreement [24 CFR 792.103]
Current	<p><u>PHA Policy</u></p> <p>No Offer of Repayment Agreement The PHA will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution or the family has entered into a repayment agreement with the PHA in the past 36 months.</p>
Proposed	<p><u>MODIFY</u> <u>PHA Policy</u></p> <p>No Offer of Repayment Agreement The PHA will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family, or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution, or if the family has entered into a repayment agreement with the PHA in the past 36 months. In the absence of a repayment agreement due to one of these conditions, the family will be required to pay the debt in full within 30 days.</p>

Chapter 18

Section	3-I.B. Program Administration Staff and Contractors (page 18-17)
Current	<p><u>PHA Policy</u></p> <p>The PHA will employ appropriate staff, including one or more FSS coordinators or program coordinators to administer the FSS program.</p>
Proposed	<p><u>MODIFY</u> <u>PHA Policy</u></p> <p>The PHA will employ appropriate staff, including one or more FSS coordinators or program coordinators, and/or contract with an outside social service organization to provide case management and care plans.</p>

Section	3-II.B. Recommended PCC Membership (page 18-19 and 18-20)
Current	<p data-bbox="358 195 1432 239"><u>PHA Policy</u></p> <p data-bbox="358 239 1432 321">The PHA’s FSS program coordinating committee membership will include leadership from organizations such as but not limited to:</p> <p data-bbox="358 321 1432 365">Community Corporation of Santa Monica</p> <p data-bbox="358 365 1432 409">WorkSource Center</p> <p data-bbox="358 409 1432 453">Chrysalis</p> <p data-bbox="358 453 1432 497">Legal Aid Foundation of Los Angeles</p> <p data-bbox="358 497 1432 541">Clare Foundation</p> <p data-bbox="358 541 1432 585">Santa Monica Housing Authority</p> <p data-bbox="358 585 1432 630">Venice Family Clinic</p> <p data-bbox="358 630 1432 674">Westside Family Health Center</p> <p data-bbox="358 674 1432 718">Vista Del Mar</p> <p data-bbox="358 718 1432 762">New Economics for Women</p> <p data-bbox="358 762 1432 806">Upward Bound House</p> <p data-bbox="358 806 1432 850">St. Joseph Center</p> <p data-bbox="358 850 1432 894">Human Services, City of Santa Monica</p> <p data-bbox="358 894 1432 938">Virginia Park Teen Center</p> <p data-bbox="358 938 1432 982">SMMUSD Child Development</p> <p data-bbox="358 982 1432 1026">Connections for Children</p> <p data-bbox="358 1026 1432 1071">SMMUSD Child Development</p>
Proposed	<p data-bbox="358 1266 1432 1310">MODIFY</p> <p data-bbox="358 1310 1432 1354"><u>PHA Policy</u></p> <p data-bbox="358 1354 1432 1619">The PHA’s FSS program coordinating committee membership will include representatives from organizations that provide services to low-income households that promote increased self-sufficiency, including, but not limited to: affordable housing, supportive services, employment services, education, healthcare, behavioral healthcare, financial management/financial education, childcare, and legal services.</p>

Section	3-II.C. ALTERNATIVE PCC COMMITTEE (page 18-20)
Current	<p><u>PHA Policy</u></p> <p>The PHA will not utilize an existing entity as its program coordinating committee.</p>
Proposed	<p>MODIFY</p> <p><u>PHA Policy</u></p> <p>The PHA may, at its discretion, choose to utilize an existing entity as its program coordinating committee.</p>
Section	5-I.C. Interim Goals (page 18-36)
Current	<p><u>PHA Policy</u></p> <p>For purposes of the PHA’s FSS program, <i>seek employment</i> means the head of household has applied for employment, attended job interviews, and otherwise followed through on employment opportunities as outlined in the individual training and services plan of his or her contract of participation.</p> <p><i>Maintain employment</i> means that the FSS head of household will complete all of the obligations outlined in the individual training and services plan in his or her contract of participation (COP) and be employed full-time on the last effective day of the COP.</p> <p><i>Suitable employment</i> is any employment that is obtained by the FSS head of household.</p>
Proposed	<p>MODIFY</p> <p><u>PHA Policy</u></p> <p>For purposes of the PHA’s FSS program, <i>seek employment</i> means the head of household has applied for employment, attended job interviews, attended job fairs, and otherwise followed through on employment opportunities as outlined in the individual training and services plan of his or her contract of participation.</p> <p><i>Maintain employment</i> means that the FSS head of household will complete all of the obligations outlined in the individual training and services plan in his or her contract of participation (COP) and be employed full-time on the last effective day of the COP.</p> <p><i>Suitable employment</i> is any full-time employment that is obtained by the FSS head of household. The FSS program requires that FSS participants obtain full time employment equivalent to 32 or more hours per week. Program participants may work at multiple jobs in order to meet this requirement.</p>

Section	5-II.B. Contract Extension (page 18-38)
Current	NO EXISTING LANGUAGE
Proposed	<p>ADD <u>PHA Policy</u></p> <p><u>FSS contract extension requests should be submitted to the FSS Coordinator before the FSS contract end date. Contract extension requests should be submitted to the FSS Coordinator a minimum of six months before an FSS participant’s contract expires.</u></p>
Section	6-I.C. Disbursement before Expiration of Contract Term (page 18-45)
Current	<p><u>PHA Policy</u></p> <p>The PHA will disburse a portion of the FSS escrow account funds before completion of the COP for completion of higher education (i.e. college, graduate School) job training, or to meet start-up expenses involved in creation of a small business.</p>
Proposed	<p>MODIFY <u>PHA Policy</u></p> <p>The PHA will disburse a portion of the FSS escrow account funds before completion of the COP <u>if the PHA determines that the family has fulfilled certain interim goals and requires a portion of their FSS escrow account funds for purposes consistent with the contract of participation. Interim disbursements should not significantly deplete an FSS participant’s escrow account, however, amounts approved for disbursement will be determined based on how critical the requested disbursement is in assisting the FSS participant accomplish their final FSS ITSP goals. Housing Manager will review and approve all requests for disbursements.</u></p>

Glossary

Current	NEW TERMINOLOGY
Proposed	<p>ADD <u>PHA Policy</u> Proof of Effort</p> <p><u>Proof of Effort is a form the PHA requires applicants and participants to fill out when requesting an extension of a voucher. The Proof of Effort form must demonstrate to the Housing Authority that a good faith effort was made during the term of the voucher to find suitable housing. The form must be completed in full, and demonstrate that on a weekly basis, the voucher holder was communicating with property owners/property management companies in the jurisdiction and visited potential apartments. The PHA may verify the information provided. Proof of Effort may also include searches outside of Santa Monica if necessary. If a voucher holder submits a Proof of Effort form that is insufficient by these standards, the PHA may deny an extension request.</u></p>