



MUSCATINE MUNICIPAL HOUSING AGENCY

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MEMORANDUM

TO: Gregg Mandsager, City Administrator

FROM: Jodi Royal-Goodwin, Housing Administrator

DATE: April 6, 2017

RE: 1) Resolution to Approve Revisions to the Housing Choice Voucher Administrative Plan
2) Resolution to Approve Revisions to the Public Housing Admissions and Continued Occupancy Policy

INTRODUCTION: Muscatine Municipal Housing Agency (MMHA) operates the Housing Choice Voucher Program and Public Housing under the regulations promulgated by the U.S. Department of Housing and Urban Development (HUD) and implemented under policies adopted in the Administrative Plan (the Plan) and Admissions and Continued Occupancy Policy (ACOP) respectively. The documents must be reviewed periodically and revised to reflect regulatory changes and local circumstances. Attached is a summary of the proposed revisions to the Plan and the ACOP.

BACKGROUND: In the past 18 months revised and adopted a number of new regulations and issued new guidance related to operation of the Public and Indian Housing (PIH) Program, including HCV. These have included what are known as the "Streamlining" and Affirmatively Furthering Fair Housing regulations, and guidance on VAWA implementation and the use of arrest records. The proposed revisions primarily implement these new requirements. However, MMHA is proposing some discretionary changes, including:

- Reordering preferences to prioritize all families residing or working in the service area over non-resident families and to provide a supplemental benefit to families completing an approved rental class. (Administrative Plan)
- Allocating 10 vouchers for families experiencing homelessness. (Administrative Plan)
- Implementing a working preference for applicants to Public Housing.
- Adopting the smoke-free housing rules. (Public Housing)
- Improving efficiencies by eliminating tasks not required and with minimal benefit.
- Prohibiting the use of the unit address by persons not on the assisted lease.
- Expanding the definition of threatening staff to include cyber stalking.
- Creating consistency between MMHA programs.

In the attached summaries of changes, the policies proposed to be changed are identified in the first column, the second column includes the policy with additions in italics and deletions with struck through text, and the last column provides a brief reason for the change.

The process of updating the Plan and ACOP requires a 45 day public comment period, consultation with the Resident Advisory Board, and a Public Hearing. The consultation was held April 3 and the members' comments have been incorporated into the proposal. Any comments received during the public hearing and the remainder of the comment period will be considered for inclusion. City Council acts as the MMHA Board of Commissioners and as such must approve changes to the Plan.

RECOMMENDATION/RATIONALE: It is recommended the Muscatine City Council, acting as the MMHA Board of Commissioners, approve the attached resolutions and authorize revisions to the Administrative Plan, including consideration of any additional comments.

Attached:
Resolutions

- 1) Resolution to Approve Revisions to the Housing Choice Voucher Administrative Plan
- 2) Resolution to Approve Revisions to the Public Housing Admissions and Continued Occupancy Policy

Summary of Changes to the Administrative Plan

Summary of Changes to the Admission and Continued Occupancy Policy

**RESOLUTION TO APPROVE REVISIONS TO THE
HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE PLAN
OF THE
MUSCATINE MUNICIPAL HOUSING AGENCY**

WHEREAS, a revision to the Housing Choice Voucher Program Administrative Plan is necessary to more efficiently administer the program and to comply with changes in Federal requirements; and,

WHEREAS, staff has reviewed Federal regulatory requirement along with Department of Housing and Urban Development and the Resident Advisory Board recommendations and has made revision for updating the Administrative Plan; and

WHEREAS, revisions to the Administrative Plan are in the best interest of the Muscatine Municipal Housing Agency and the community; and

WHEREAS, the City Council, acting as the MMHA Board of Commissioners, must authorize and approve all policy changes to the Housing Choice Voucher Program Administrative Plan.

NOW THEREFORE, BE IT RESOLVED, the City Council hereby approves and authorizes policy changes to the Housing Choice Voucher Administrative Plan.

MOVED, PASSED, AND ADOPTED this 6th day of April 2017.

**BY THE CITY COUNCIL OF
THE CITY OF MUSCATINE, IOWA**

Diana L. Broderson, Mayor
City of Muscatine, Iowa

ATTEST:

Gregg Mandsager, City Clerk
City of Muscatine, Iowa

Summary of Revisions to the MMHA Housing Choice Voucher Administrative Plan

Policy	Proposal	Reason
	Chapter 1: OVERVIEW OF THE PROGRAM AND PLAN	
1-I.A. Overview	<p>The Muscatine Municipal Housing Agency is the HUD sanctioned Housing Authority for the County of Muscatine. The Agency is administered by the City's Housing department with City Council acting as the Agency Board of Commissioners with the advice input of the Public Housing Resident Advisory Board. The Housing Department is responsible for managing City and not for profit public housing, tenant and project based rental assistance rental-assisted privately owned housing, the home ownership program, family self-sufficiency and programming to support academic achievement for children residing in public housing assisting with the Housing Rehabilitation and Housing Code Enforcement Programs.</p> <p>Goal Statement: To formulate, implement and administer nondiscriminatory programs that strive to provide low/moderate income households who reside or expect to reside in Muscatine County the opportunity to choose a healthy, safe dwelling and neighborhood, free of major harmful environmental influences, convenient to social, cultural, educational, commercial, recreational, and economic opportunities, within a reasonable expense to income ratio.</p> <p style="text-align: center;">Agency Flow Chart</p> <pre> graph TD HA["Housing Administrator-1 (reports to City Administrator & City Council)"] HC["Housing Coordinator 1 FT"] HS["Housing Specialist-2 FT"] HMI["Housing Maintenance Supervisor/Inspector 1 FT"] MR["Maintenance Repairperson-1"] HA --- HC HA --- HS HA --- HMI HMI --- MR </pre>	Simplify statement and match to ACOP
1-I.C. PHA MISSION	<p>The PHA's mission is to promote personal, economic and social upward mobility for very low-income families through the provision of affordable, safe, decent and sanitary housing and appropriate services for very low income families and to manage resources efficiently. The PHA is to promote personal, economic and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing.</p>	To more accurately reflect the role of MMHA
	Chapter 2: FAIR HOUSING AND EQUAL OPPORTUNITY	
2-I.A. OVERVIEW	<p>Iowa Code Chapter 216 also prohibits discrimination based on creed, age of visitors (may not prohibit visitors with children), or another person in any of the rights protected against discrimination by this chapter because such person has lawfully opposed any practice forbidden under this chapter, obeys the provisions of this chapter, or has filed a complaint, testified, or assisted in any proceeding under this Chapter. No state or local nondiscrimination laws or ordinances apply.</p>	To accurately reflect applicable state code
PHA Policy	<p>Applicants or participants who believe that they have been subject to unlawful discrimination may notify the PHA either orally or in writing.</p> <p><i>Within 10 business days of receiving the complaint, the PHA will provide a written notice to those alleged to have violated the rule. The PHA will send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as provide a copy</i></p>	Implementation of requirements under the new Affirmatively Furthering Fair Housing Law

	<p>of a discrimination form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).</p> <p>The PHA will attempt to remedy discrimination complaints made against the PHA <i>and will conduct an investigation into all allegations of discrimination.</i></p> <p><i>Within 10 business days following the conclusion of the PHA's investigation, the PHA will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.</i></p> <p><i>The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</i></p>	
2-II.A. OVERVIEW	<p>The PHA will ask all applicants and resident families if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:</p> <p>"If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority."</p> <p>A specific position and phone number will be provided as the contact person for requests for accommodation for persons with disabilities.</p>	A resident can request an accommodation by talking to property management or any MMHA staff
2-III.D. IMPLEMENTATION PLAN Limited English Proficiency	<p>If it is determined that the PHA serves very few LEP persons, and the PHA has very limited resources, the PHA will not develop a written LEP plan, but will consider alternative ways to articulate in a reasonable manner a plan for providing meaningful access. Entities having significant contact with LEP persons, such as schools, grassroots and faith-based organizations, community groups, and groups working with new immigrants will be contacted for input into the process.</p> <p>If the PHA determines it is appropriate to develop a written LEP plan, The following five steps will be taken in developing an appropriate LEP: (1) Identifying LEP individuals who need language assistance; (2) identifying language assistance measures; (3) training staff; (4) providing notice to LEP persons; and (5) monitoring and updating the LEP plan.</p>	The remaining language are the mandated steps to developing a LEP, there is no option not to develop a plan.
	Chapter 3: ELIGIBILITY	
3-I.J. GUESTS	<p>A guest can remain in the assisted unit no longer than 1430 consecutive days or a total of 3090 cumulative calendar days during any 12-month period.</p> <p>Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.</p> <p>A family may request an exception to this policy for valid reasons (e.g., care of a relative recovering from a medical procedure is expected to last more than 1440 consecutive days <i>but not more than 90 days</i>). <i>The PHA may request an exception will not be made unless the family can</i> identify and provide documentation of the residence to which the guest will return.</p> <p><i>Persons other than authorized members of the assisted family must not use the assisted address for any purpose. An exception may be</i></p>	Consistency with ACOP and reasonable length of time for a typical guest

	<i>authorized by the PHA in cases where the PHA has approved utilities being placed in the name of a nonhousehold member.</i>	
3-I.L. ABSENT FAMILY MEMBERS Definitions of Temporarily and Permanently Absent	<p>Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.</p> <p><i>If a family anticipates being absent from the assisted unit 30 days or longer, the family must notify the PHA in advance or as soon as the family becomes aware of the extended absence.</i></p>	Clarify when MMHA should be notified of a family member will be out of the unit
Family Members Permanently Confined for Medical Reasons	<p>The PHA will request verification of the family member's permanent absence from the family a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis the member will be considered permanently absent., they may present, and the PHA will consider, any additional documentation or evidence.</p>	Reduce stress on clients by not requiring excessive verification
3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS U.S. Citizens and Nationals	<p>Family members who declare citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.</p> <p><i>Family members who claim to be eligible noncitizens must provide a valid permanent residency card or other documentation illustrating eligibility. Eligibility will be established using the SAVES system or whichever system is recommended or required by the Federal government for this purpose.</i></p>	Identifies the process actually used by staff
3-III.B. MANDATORY DENIAL OF ADMISSION	<p>HUD requires the PHA to deny assistance in the following cases:</p> <ul style="list-style-type: none"> Any member of the household has been evicted from federally-assisted housing in the last 3 years for drug-related criminal activity. HUD permits, but does not require, the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household). <p><u>PHA Policy</u></p> <p>The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past 3 years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.</p> <ul style="list-style-type: none"> The PHA determines that any household member is currently engaged in the use of illegal drugs. <p><u>PHA Policy</u></p> <p><i>Currently engaged in</i> is defined as any use of illegal drugs during the previous six months, <i>as illustrated by a recent arrest or other documentable activity.</i></p>	Policy clarification in compliance with HUD guidance

	<ul style="list-style-type: none"> The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents. <p><u>PHA Policy</u></p> <p>In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. <i>A pattern is defined as 2 or more incidents involving illegal drugs or abuse of alcohol within the past 12 months.</i> A conviction will be given more weight than an arrest. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.</p> <ul style="list-style-type: none"> Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing <p><u>PHA Policy</u></p> <p><i>A household will be determined ineligible if evidence exists that any member of the household has been involved in the production, manufacture, or distribution of methamphetamine within the past five years.</i></p> <ul style="list-style-type: none"> Any household member is subject to a lifetime registration requirement under a state sex offender registration program <p><u>PHA Policy</u></p> <p><i>The PHA will deny admission if any household member is subject to any federal, state or local sex offender registration program.</i></p>	
3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE Criminal Activity	<p>If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past five years, the family may will be denied assistance.</p> <p><i>Drug-related criminal activity</i>, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].</p> <p><i>Violent criminal activity</i>, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].</p> <p>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; or</p> <p>Criminal activity that may threaten the health or safety of property owners, management staff, and persons performing contract administration functions or other responsibilities on behalf of the PHA (including a PHA employee or a PHA contractor, subcontractor, or agent).</p>	Implementation of

	<p><i>Immediate vicinity</i> means within a three-block radius of the premises.</p> <p>Evidence of such criminal activity includes, but is not limited to:</p> <p>Any conviction for drug-related or violent criminal activity within the past 5 years.</p> <p>Records of arrests for drug-related or violent criminal activity within the past 5 years, <i>although a record of arrest(s) alone will not be used as the basis for the denial or proof that the applicant engaged in disqualifying criminal activity.</i></p> <p>Any record of eviction from public or privately-owned housing as a result of criminal activity within the past 5 years.</p> <p>A conviction for drug-related or violent criminal activity will be given more weight than an arrest for such activity.</p> <p>In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.</p>	HUD guidance on the use of arrest records
Previous Behavior in Assisted Housing	<p>The PHA will not deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program.</p> <p>The PHA will deny assistance to an applicant family if:</p> <p>The family does not provide information that the PHA or HUD determines is necessary in the administration of the program.</p> <p>The family does not provide complete and true information to the PHA.</p> <p>Any family member has been evicted from federally-assisted housing in the last five years.</p> <p>Any PHA, <i>including MMHA</i>, has terminated assistance under the program for any member of the family <i>within the past 12 months</i>.</p> <p>Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.</p> <p>The family owes rent or other amounts to any PHA in connection with the HCV, Certificate, Moderate Rehabilitation or public housing programs, unless the family repays the full amount of the debt prior to a Housing Assistance Voucher being extended. If the debt is owed to the PHA debt must also be paid in full, however the Executive Director <i>Housing Administrator</i> may allow a family previously terminated from the PHA HCV program for being delinquent on a repayment agreement to become current on the Agreement and contingent upon receipt of monthly payments. applicants pays the debt to the agency in full or enters inot a repayment agreement with MMHA prior to receiving assistance and in accordance with administrative policies Chapter 16-IV-B Repayment Agreements. (Iowa State Law statute of limitations will supersede this denial (10 years)</p> <p>The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement <i>prior to a voucher</i></p>	<p>To encourage compliance and retaining assistance</p> <p>Assisting families will improve the ability to collect on amounts owed while promoting housing stability. These amendments give MMHA flexibility to balance the needs on a case-by-case basis. The Iowa statute of limitation does not</p>

	<p>for housing assistance being issued. pays the debt to the agency in full or enters into a repayment agreement with MMHA prior to receiving assistance and in accordance with administrative policies Chapter 16 IV.B Repayment Agreements. (Iowa State Law statute of limitations will supersede this denial (10 years) The Housing Administrator Executive Director may allow a family previously terminated from the PHA HCV program for being delinquent on a repayment agreement to become current on the Agreement and contingent upon receipt of monthly payments.</p> <p>A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.</p> <p><i>Abusive or violent behavior towards PHA personnel</i> includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.</p> <p><i>Threatening</i> refers to oral, written or veiled threats, or physical gestures that communicate intent to abuse or commit violence. <i>Including spoken or written words tending to intimidate or menace other involved, or suggested without being directly or explicitly stated. A declaration of intention or determination to inflict punishment or injury, in retaliation for, or conditionally upon, some action or course. Sending threatening or harassing emails, instant messages, or website entries. Repeated attempts to target a specific PHA staff member by directly contacting them, or indirectly using or disseminating their personal information, causing them distress, fear, or anger.</i></p> <p>In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.</p>	<p>supersede the requirement of PHAs to collect amounts owed to PHAs</p> <p>Addition of cyber stalking definition regarding threatening behaviors toward staff due to recent incidences</p>
<p>3-III.D. SCREENING Screening for Eligibility</p>	<p>The PHA will perform a criminal background check for every adult household member <i>using state and local records. If the applicant reports or the PHA has reason to believe any adult household members have resided or spent significant time in locations outside of the state of Iowa a national criminal background check will be conducted through a third-party service.</i></p> <p>If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, the PHA may<i>will</i> request a fingerprint card and will request information from the National Crime Information center (NCIC).</p>	<p>This reflects the process used and gives us the option to investigate further if determined necessary</p>
	<p>The PHA will use the Dru Sjodin National Sex Offender database to screen applicants for admission. <i>This screening may be conducted by a third-party service.</i></p>	<p>Required notification</p>
<p>3-III.E. CRITERIA FOR DECIDING TO DENY ADMISSION Consideration of Circumstances</p>	<p>The PHA will consider the following factors <i>and circumstances</i> prior to making its decision:</p> <p>The seriousness of the case, especially with respect to how it would affect other residents' <i>safety or property</i></p> <p>The effects that denial of assistance may have on other members of the family who were not involved in the action or <i>failure to act</i></p> <p>The extent of participation or culpability of individual family members,</p>	

	<p>including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.G) a victim of domestic violence, dating violence, sexual assault, or stalking</p> <p>The length of time since the violation occurred, <i>including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future</i></p> <p><i>While a record of arrest(s) will not be used as the basis for denial, an arrest may, however, trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:</i></p> <p><i>Any statements made by witnesses or the applicant not included in the police report</i></p> <p><i>Whether criminal charges were filed</i></p> <p><i>Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal</i></p> <p><i>Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity</i></p> <p><i>Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property</i></p> <p>In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully</p> <p>The PHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.</p>	HUD issued guidance on the limitation of arrest records for denials and terminations
Removal of a Family Member's Name from the Application	<p>As a condition of receiving assistance, a family may agree to remove the culpable family member from the application. In such instances, the head of household must certify that the family member will not be permitted to visit or to stay as a guest in the public housing unit.</p> <p>After admission to the program, Prior to occupancy the family must present evidence of the former family member's current address upon PHA request.</p>	To proactively address the issue of unauthorized residents
	Chapter 4: APPLICATIONS, WAITING LIST AND TENANT SELECTION	
4-I.B. APPLYING FOR ASSISTANCE	<p><i>Depending upon the length of time that applicants may need to wait to receive assistance, the PHA may use a one- or two-step application process.</i></p> <p><i>A one-step process will be used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance.</i></p> <p><i>A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. Under the two-step application process, the PHA initially</i></p>	Clarify process to be followed under different circumstances

	<p><i>will require families to provide the information needed to make an initial assessment of the family's eligibility, and determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.</i></p> <p><i>Families may obtain application forms from the PHA's office during normal business hours or download and print from the website at www.muscatineiowa.gov. Families may also request – by telephone or by mail – that an application be mailed to them via first class mail.</i></p> <p>Completed applications must be returned to the PHA by mail, by fax, or submitted in person during normal business hours. Applications must be complete in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will <i>return the application identifying</i> notify the family of the additional information required.</p> <p><i>At the time of application, applicants will elect to be placed on any one or all of the available waiting lists, including the tenant-based, Fulton Place or Harrison Lofts waiting list. If an applicant fails to identify the wait list being applied for, the applicant will be placed only on the tenant-based waiting list.</i></p> <p>The PHA will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.</p> <p>While the waiting list is open families may obtain application forms from the PHA's office during normal business hours. Families may also request – by telephone or by mail – that a form be sent to the family via first class mail.</p>	Reflects addition of project based voucher options
<p>4-I.D. PLACEMENT ON THE WAITING LIST</p> <p>Eligible for Placement on the Waiting List</p>	<p>The PHA will send written notification of the preliminary eligibility determination within 10 business days of receiving a complete application. If applicable, the notice will also indicate the waiting list preferences for which the family appears to qualify.</p> <p>Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.</p> <p>Applicants will be placed on the waiting list according to the PHA preference(s) and the date and time their complete application is received by the PHA for which they qualify, and the date and time their complete application is received by the PHA.</p> <p>Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. When the family is selected from the waiting list, the PHA will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.</p>	Omit unnecessary step to save staff time and resources and duplicated paragraph
<p>4-II.B. ORGANIZATION OF THE WAITING LIST</p>	<p>The PHA will maintain a single waiting list for the tenant-based HCV program <i>with separate waiting lists for units covered by project-based HCV assistance.</i></p> <p>The PHA will not merge the HCV waiting lists with the waiting list for any other program the PHA operates. <i>The PHA will maintain a tenant-based wait list and separate wait lists for each property with a HAP contract for project-based rental assistance.</i></p>	Addresses addition of project based options

4-II.C. OPENING AND CLOSING THE WAITING LIST	<p>The PHA will <i>may</i> close the waiting list as needed when the estimated wait time for housing assistance for new applicants families on the list <i>reaches</i> is greater than 24 months <i>for the most current applicants</i>.</p> <p>Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.</p>	<p>Allow flexibility in managing the waiting list</p>
4-II.F. UPDATING THE WAITING LIST Purging the Waiting List	<p>The waiting list will <i>may</i> be updated annually to ensure that all applicants and applicant information is current and timely.</p> <p>To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.</p> <p>The family's response must be in writing and may be delivered in person, by mail, or by e-mail fax. Responses should be postmarked or received by the PHA not later than 105 business days from the date of the PHA letter.</p> <p>If the family fails to respond within 10 business days, the family will be removed from the waiting list without further notice in accordance with removal from the waiting list policy (see Chapter 4 page 11).</p> <p>If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.</p> <p>If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 10 business days to respond from the date the letter was re-sent.</p> <p>If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if it is determined that the lack of response was due to PHA error or to circumstances beyond the family's control.</p>	<p>Flexibility in managing the waiting list</p> <p>10 days is the typical amount of time an applicant or tenant would have to respond to correspondence as is believed to be both more fair and reasonable in this circumstance</p>
4-III.B. SELECTION METHOD Local Preferences	<p>P1. The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.</p> <p>P2.</p> <ul style="list-style-type: none"> • Effective March 1, 1997, a local preference was established by the City of Muscatine for qualified families being displaced as a result of a property being substandard not as a result of actions or inactions by the qualifying family. • Displaced Individuals or families displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws. • <i>Up to 10 families referred by Muscatine Center for Social Action (MCSA) who are currently experiencing Category 1 or Category 4 homelessness, as defined by HUD, and will be provided on-going supportive services by MCSA or other qualified agency.</i> <p>P3. Families with children under the age of 18 or all elderly or disabled families who are residents (have a legal domicile) at time of application</p>	<p>Pilot project to target those most in need with services and support anticipated grant application</p>

	<p>and when their name comes to the top of the waiting list, in the Muscatine Municipal Housing Agency jurisdiction, or applicants who are working or who have been notified that they are hired to work in the agency jurisdiction. Applicants shall also be given the benefit of the working family preference if the head and spouse, or sole member is age 62 or older, or is a person with disabilities. 24 CFR 982.207(b) (1);</p> <p>P4. <i>Families with no children under 18 years of age who are residents (have a legal domicile), at time of application and when their name comes to the top of the waiting list, in the Muscatine Municipal Housing Agency jurisdiction or applicants who are working or who have been notified that they are hired to work in the agency jurisdiction 24 CFR 982.207(b)(1); Families with children under the age of 18 who are not residents (do not have a legal domicile) in the Muscatine Municipal Housing Agency jurisdiction 24 CFR 982.207(b)(1);</i></p> <p>P5. <i>All families, other than those where the head and spouse, or sole member is age 62 or older, or is a person with disabilities, who are not residents in the Muscatine Municipal Housing Agency jurisdiction. Families with children under the age of 18 who are not residents (do not have a legal domicile) in the Muscatine Municipal Housing Agency jurisdiction 24 CFR 982.207(b)(1); Families with no children under 18 years of age who are residents (have a legal domicile) in the Muscatine Municipal Housing Agency jurisdiction 24 CFR 982.207(b)(1);</i></p> <p>P6. <i>Families with no children under 18 years of age who are not residents (do not have a legal domicile) in the Muscatine Municipal Housing Agency jurisdiction 24 CFR 982.207(b)(1);</i></p> <p><i>Applicants who have attended a PHA approved rental class will receive priority over other families eligible for the same preferences. For example, a P3 family that has completed such a class will receive priority over P3 family that has not.</i></p>	<p>Reinforce the preference to serve local families first</p> <p>Clarify the order for serving non-resident families of any type</p> <p>Improve the tenants understanding of their role as a renter</p>
Order of Selection	<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 <i>and after priority for families having completed a PHA approved rental class families in the same preference category will be selected in numerical order based on the date and time of their program application on a first-come, first-served basis according to the date and time their complete application is received by the PHA.</i> 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>	Implements new preferences
4-III.C. NOTIFICATION OF SELECTION	<p>The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:</p> <p>Date, time, and location of the scheduled <i>briefing and/or</i> application interview, including any procedures for rescheduling the interview. <i>Typically the applicant family will be invited to attend a briefing first followed by an interview;</i></p> <p>Who is required to attend the <i>briefing</i>/interview; and</p> <p>All documents that must be provided at the interview, including</p>	Reflect process change to improve lease up rate

	<p>information about what constitutes acceptable documentation.</p> <p><i>If a notification is returned with a forwarding address, the notification will be sent to the new address. If a notification letter is returned to the PHA with no forwarding address, 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.</i></p>	Clarify when additional steps will be taken to contact applicant
4-III.E. THE APPLICATION INTERVIEW	<p>Families selected from the waiting list are required to participate in an eligibility interview and a group briefing.</p> <p>The head of household must attend and the spouse/cohead will be strongly encouraged to attend the interview together. <i>A spouse or cohead may be authorized to attend the interview/briefing on behalf of the family if the head of household is unable to attend due to circumstances beyond their control and with prior approval of the Housing Administrator. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family.</i> Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to the PHA.</p> <p>The head of household and spouse/cohead must provide acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity.) If the family representative does not provide the required documentation at the time of the interview, he or she will be required to provide it within 10 business days.</p> <p>Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 10 days. If not all household members have disclosed their SSNs at the next time the PHA is issuing vouchers, the PHA will issue a voucher to the next eligible applicant family on the waiting list.</p> <p>The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.</p> <p>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 (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).</p> <p>An advocate, interpreter, or other assistant may assist the family with the application and the interview process.</p> <p>Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LAP plan.</p> <p>If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled</p>	Clarify when someone other than the head of household may represent the family in required meetings

	<p>interview without informing the Housing Agency the applicant will be removed from the waiting list based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.</p> <p>If a family is removed from the waiting list or denied assistance based on not attending the required interview, the <i>Housing Administrator</i> Executive Director may reinstate the family if s/he determines the lack of response was due to PHA error, or to circumstances beyond the family's control.</p>	
	Chapter 5: BRIEFINGS AND VOUCHER ISSUANCE	
5-I.B. BRIEFING	<p><i>Briefings will be conducted in group meetings.</i></p> <p>Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, the PHA may approve another adult family member to attend the briefing.</p> <p><i>Families that attend group briefings and still need individual assistance will be referred to an appropriate PHA staff person.</i></p> <p>Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LAP plan (See Chapter 2).</p> <p>Notification and Attendance</p> <p><u>PHA Policy</u></p> <p>Families will be invited to a briefing when their name reaches top of the wait list. Families will be notified of their eligibility for assistance at the time they are invited to attend a briefing. The invitation notice will identify who is required to attend the briefing, as well as the date and time of the scheduled briefing.</p> <p>If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated.</p> <p>Applicants who fail to attend a scheduled briefing will be <i>re-scheduled</i> for into another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).</p>	<p>Clarify process and assistance meeting the needs of individual applicants</p> <p>Families are notified of eligibility at the interview or following when all required documents are submitted and evaluated</p>
5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE	<p><i>Children of separate genders, regardless of age, will be allocated separate bedrooms with 2 children per bedroom. Siblings and children of the same gender, regardless of age, will be allocated 1 bedroom.</i></p> <p><i>Adults regardless of gender will be allocated one bedroom for every 2 adults, except related persons of different generations or with close familial relationship (e.g. adult brother and sister, mother and daughter) will be allocated separate bedrooms.</i></p> <p>The PHA will assign one bedroom for each two persons within the household, except in the following circumstances:</p> <p>Persons of the opposite sex (other than spouses, and children under age 5) will be allocated separate bedrooms.</p> <p>Single person families will be allocated one bedroom.</p>	<p>Clarification and to avoid additional moves as children of different genders age</p>

	<p>Live-in aides will be allocated a separate bedroom.</p> <p>The PHA will reference the following chart in determining the appropriate voucher size for a family:</p> <table><tr><th>Voucher Size</th><th>Persons in Household (Minimum – Maximum)</th></tr><tr><td>1 Bedroom</td><td>1-2</td></tr><tr><td>2 Bedrooms</td><td>2-4</td></tr><tr><td>3 Bedrooms</td><td>3-6</td></tr><tr><td>4 Bedrooms</td><td>4-8</td></tr><tr><td>5 Bedrooms</td><td>6-10</td></tr></table>	Voucher Size	Persons in Household (Minimum – Maximum)	1 Bedroom	1-2	2 Bedrooms	2-4	3 Bedrooms	3-6	4 Bedrooms	4-8	5 Bedrooms	6-10	
Voucher Size	Persons in Household (Minimum – Maximum)													
1 Bedroom	1-2													
2 Bedrooms	2-4													
3 Bedrooms	3-6													
4 Bedrooms	4-8													
5 Bedrooms	6-10													
5-II.D. VOUCHER ISSUANCE	Vouchers will be issued to eligible applicants <i>at the interview and submittal if all required documentation mandatory briefing</i>	Clarify process/timing												
5-II.E. VOUCHER TERM AND EXTENSIONS Extensions of Voucher Term	<p><i>The PHA will automatically approve one 30-day extension upon written request from the family.</i></p> <p>The PHA will approve additional extensions only in the following circumstances:</p> <p>It is necessary as a reasonable accommodation for a person with disabilities.</p> <p>It is necessary due to reasons beyond the family’s control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:</p> <p>Serious illness or death in the family</p> <p>Other family emergency</p> <p>Obstacles due to employment</p> <p>Whether the family has already submitted requests for tenancy approval that were not approved by the PHA</p> <p>Whether family size or other special circumstances make it difficult to find a suitable unit</p> <p>Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.</p> <p>All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).</p> <p>The PHA will decide whether to approve or deny an extension request within 10 business days of the date the request is received, and will immediately provide the family written notice of its decision.</p>	Clarify process for extensions												
Suspensions of Voucher Term	When a Request for Tenancy Approval is received by the PHA, the term of the voucher will be suspended while the PHA processes the request.	Regulatory requirement rather than policy at this time												
Expiration of Voucher Term	If an applicant family’s voucher term or extension expires before the family has submitted a Request for Tenancy Approval (RTA) PHA has approved a tenancy, the PHA will require the family to reapply for assistance.	Remove duplicative language												

	<p>Within 10 business days after the expiration of the voucher term or any extension, the PHA will notify the family in writing that the voucher term has expired and that the family must reapply in order to be placed on the waiting list.</p>	Omit step not required to reduce staff time and expenditures
	Chapter 6: INCOME AND SUBSIDY DETERMINATIONS	
6-I.E. EARNED INCOME DISALLOWANCE	<p>Calculation of the Disallowance Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with his or her "baseline income." The family member's baseline income is his or her income immediately prior to qualifying for the EID. The family member's baseline income remains constant throughout the period that he or she is participating in the EID. While qualification for the disallowance is the same for all families, calculation of the disallowance will differ depending on when the family member qualified for the EID. <i>Participants qualifying prior to May 9, 2016, will have the disallowance calculated under the "Original Calculation Method" described below which requires a maximum lifetime disallowance period of up to 48 consecutive months. Participants qualifying on or after May 9, 2016, will be subject to the "Revised Calculation Method" which shortens the lifetime disallowance period to 24 consecutive months.</i></p> <p><i>Under both the original and new methods, the EID eligibility criteria, the benefit amount, the single lifetime eligibility requirement and the ability of the applicable family member to stop and restart employment during the eligibility period are the same.</i></p> <p>Revised Calculation Method</p> <p>Initial 12-Month Exclusion <i>During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.</i></p> <p><u>PHA Policy</u> <i>The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.</i></p> <p>Second 12-Month Exclusion <i>During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.</i></p> <p><u>PHA Policy</u> <i>During the second 12-month exclusion period, the PHA will exclude 50 percent of any increase in income attributable to new employment or increased earnings.</i></p> <p>Lifetime Limitation <i>The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they begin to receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance.</i></p>	Regulatory change regarding Earned Income Disallowance calculations & implementation policy

	Chapter 7: VERIFICATION	
7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION Value of Assets and Asset Income	<p><i>For families with net assets totaling \$5,000 or less, the PHA may accept the family's declaration of asset value and anticipated asset income. However, the PHA is required to obtain third-party verification of all assets regardless of the amount during the intake process and at least every three years thereafter.</i></p> <p><u>PHA Policy</u></p> <p><i>For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration.</i></p> <p><i>The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every three years thereafter.</i></p>	Implements streamlining regulations authorizing procedural changes for asset verifications to ease administrative requirements
7-I.E. SELF-CERTIFICATION	<p><i>When HUD requires third-party verification, self-certification or "tenant declaration," is used as a last resort when the PHA is unable to obtain third-party verification. Self-certification, however, is an acceptable form of verification when:</i></p> <ul style="list-style-type: none"> <i>A source of income is fully excluded</i> <i>Net family assets total \$5,000 or less and the PHA has adopted a policy to accept self certification at annual recertification, when applicable</i> <i>The PHA has adopted a policy to implement streamlined annual recertifications for fixed sources of income (See Chapter 11)</i> <p><i>When the PHA was required to obtain third-party verification but instead relies on a tenant declaration for verification of income, assets, or expenses, the family's file must be documented to explain why third-party verification was not available.</i></p> <p><u>PHA Policy</u></p> <p><i>When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.</i></p> <p><i>The PHA may require a family to certify that a family member does not receive a particular type of income or benefit.</i></p> <p><i>The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a PHA representative or PHA notary public.</i></p>	Implements streamlining regulations authorizing procedural changes for verifications
7-II.B. SOCIAL SECURITY NUMBERS	<p>The family must provide documentation of a valid social security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include, existing program participants who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.</p> <p>Note that an individual who previously declared to have eligible immigration status may not change his or her declaration for the purpose</p>	

of avoiding compliance with the SSN disclosure and documentation requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

The PHA must accept the following documentation as acceptable evidence of the social security number:

- An original SSN card issued by the Social Security Administration (SSA)
- An original SSA-issued document, which contains the name and SSN of the individual
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

The PHA may only reject documentation of an SSN provided by an applicant or participant if the document is not an original document or if the original document has been altered, mutilated, is illegible, or appears to be forged.

PHA Policy

The PHA will explain to the applicant or participant the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 30 ~~90~~ days.

In the case of Moderate Rehabilitation Single Room Occupancy (SRO) individuals, the required documentation must be provided within 90 calendar days from the date of admission into the program. The PHA must grant one additional 90-day extension if it determines that the applicant's failure to comply was due to circumstances that were beyond the applicant's control and could not have been reasonably foreseen.

PHA Policy

The PHA will *not* grant *extensions*. ~~one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.~~ If the individual fails to comply with SSN disclosure and documentation requirements upon expiration of the provided time period, the PHA will terminate the individual's assistance.

If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of voucher issuance, an otherwise eligible family may be admitted to the program and the family must provide documentation of the child's SSN within 90 days of the effective date of the initial HAP contract. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control.

PHA Policy

The PHA will *not* grant extensions. ~~one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.~~

When a participant requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the

To avoid unnecessary delays in lease up, securing a new SS card typically can be accomplished in less than 2 weeks

	<p>participant must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.</p> <p><i>When a participant requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the participant must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.</i></p> <p><u>PHA Policy</u></p> <p><i>The PHA will not grant additional extensions.</i></p> <p>Social security numbers must be verified only once during continuously-assisted occupancy.</p> <p><u>PHA Policy</u></p> <p>The PHA will verify each disclosed SSN by:</p> <p>Obtaining documentation from applicants and participants that is acceptable as evidence of social security numbers</p> <p>Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder</p> <p>Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.</p> <p><u>PHA Policy</u></p> <p>The PHA will retain documentation of social security numbers in the file once an individual's status is classified as "verified" in HUD's EIV system, the PHA will remove and destroy copies of documentation accepted as evidence of social security numbers.</p>	<p>Mandated change for children moving into an assisted household</p> <p>Documents are retained to assist clients</p>
<p>7-II.D. FAMILY RELATIONSHIPS</p> <p>Absence of Adult Member</p>	<p>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).</p> <p><i>Notes from relatives and friends indicating a previous household member is "staying with them" will generally not be considered acceptable documentation.</i></p>	<p>To clarify expectations for removing a household member and verifying residency of unauthorized household members</p>
<p>7-III.A. EARNED INCOME</p> <p>Wages</p>	<p>For wages other than tips, the family must provide originals of the <i>most recent 60 days two-most current</i>, consecutive pay stubs.</p>	<p>Longer period/more data allows more accurate calculation</p>
<p>7-III.I. ZERO ANNUAL INCOME</p>	<p>The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as</p>	<p>Clarify committing fraud if do not</p>

STATUS	unemployment benefits, TANF, SS, SSI, and earnings are not being received by families claiming to have zero annual income. <i>Households claiming zero annual income will be required to submit certification indicating they do not receive income of any type, including in-kind and payments-in-lieu of cash.</i>	disclose income of any type
	Chapter 8: HOUSING QUALITY STANDARDS AND RENT REASONABLENESS DETERMINATIONS	
8-I.B. ADDITIONAL LOCAL REQUIREMENTS	The Housing Agency will comply with all local codes and standards that the City of Muscatine determines for rental property in the city. All other areas of the county will comply with HQS minimum standards and other standards identified below.	To match inspections with City rental code compliance inspections
Clarifications of HUD Requirements	<p>As permitted by HUD, the PHA has adopted the following specific requirements that elaborate on HUD standards.</p> <p>Walls</p> <p>In areas where plaster or drywall is sagging, severely cracked, or otherwise damaged, it must be repaired or replaced.</p> <p>Windows</p> <p>Window sashes must be in good condition, solid and intact, and properly fitted to the window frame. Damaged or deteriorated sashes must be replaced.</p> <p>Windows must be weather-stripped as needed to ensure a weather-tight seal.</p> <p>Window screens must be in good condition (applies only if screens are present).</p> <p>Doors</p> <p>All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.</p> <p>All interior doors must have no holes, have all trim intact, and be openable without the use of a key.</p> <p>Floors</p> <p>All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be resecured and made level. If they cannot be leveled, they must be replaced.</p> <p>All floors must be in a finished state. Raw wood or unsealed concrete is not permitted.</p> <p>All floors should have some type of base shoe, trim, or sealing for a "finished look." Vinyl base shoe is permitted.</p> <p>Sinks</p> <p>All sinks and commode water lines must have shut off valves, unless faucets are wall mounted.</p> <p>All sinks must have functioning stoppers.</p> <p>Toilets</p> <p>All worn or cracked toilet seats and tank lids must be replaced and</p>	To match City rental code requirements

	<p>toilet tank lid must fit properly. <i>Loose seats must be repaired.</i></p> <p>Security</p> <p>If window security bars or security screens are present on emergency exit windows, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.</p>	
8-II.A. OVERVIEW [Inspections]	<p>Inspection Costs [Notice PIH 2016-05]</p> <p>The PHA may not charge the family for unit inspections or reinspections [24 CFR 982.405(e)]. In the case of inspections of PHA-owned units, the PHA may compensate the independent agency from ongoing administrative fee for inspections performed. The PHA and the independent agency may not charge the family any fee or charge for the inspection [24 CFR.982.352(b)].</p> <p><i>The PHA may not charge the owner for the inspection of the unit prior to the initial term of the lease or for a first inspection during assisted occupancy of the unit. However, the PHA may charge a reasonable fee to owners for reinspections in two situations: when the owner notifies the PHA that a repair has been made but the deficiency has not been corrected, and when the time for repairs has elapsed and the deficiency has not been corrected. Fees may not be imposed for tenant-caused damages, for cases in which the inspector could not gain access to the unit, or for new deficiencies discovered during a reinspection.</i></p> <p>The owner may not pass the cost of a reinspection fee to the family. Reinspection fees must be added to the PHA's administrative fee reserves and may only be used for activities related to the provision of tenant-based assistance.</p> <p><u>PHA Policy</u></p> <p><i>The PHA will not charge a fee for failed reinspections.</i></p>	<p>New regulations authorize MMHA to charge a reinspection fee, but due to the change in process we are electing not to adopt a fee at this time</p>
Owner and Family Inspection Attendance	<p><i>When a family occupies the unit at the time of inspection an adult family member must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.</i></p> <p><i>At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted, but is not required.</i></p> <p>The PHA will conduct the inspection if either an adult family member or an owner's representative is present.</p>	Explains current practice
8-II.B. INITIAL HQS INSPECTION Timing of Initial Inspections	The PHA will complete the initial inspection, determine whether the unit satisfies <i>applicable housing standards HQS</i> , and notify the owner and the family of the determination within 10 <i>15-business</i> days of submission of the Request for Tenancy Approval (RTA).	To clarify requirements and making timing of notice consistent
Utilities	<i>Utilities must be on at the time of the initial inspection.</i>	Clarify requirement
8-II.C. ANNUAL/ BIENNIAL HQS INSPECTIONS	<p><i>Each unit under HAP contract must be inspected within 24 months of the last full HQS inspection. Units continuously occupied by the same family will be inspected not less than every other year, with unit inspection dates in odd months conducted in odd years and unit inspection dates due in even months conducted in even year.</i></p> <p><i>The PHA will not rely on alternative inspection standards.</i></p>	<p>Change timing of biennial units to spread out work demand</p> <p>Will still use HQS and local standards</p>

<p>8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT</p> <p>Extensions</p>	<p>Extensions will be granted in cases where the PHA has determined that the owner has made a good faith effort to correct the deficiencies and is unable to for reasons beyond the owner's control. Reasons may include, but are not limited to:</p> <p>A repair cannot be completed because required parts or services are not available.</p> <p>A repair cannot be completed because of weather conditions.</p> <p>A reasonable accommodation is needed because the family includes a person with disabilities.</p> <p>The length of the extension will be determined on a case by case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. <i>The necessary repairs must be made within 30 calendar days, once the weather conditions have subsided.</i></p>	<p>Identify deadline for making repairs given weather related extensions</p>
<p>8-II.G. ENFORCING OWNER COMPLIANCE</p> <p>HAP Abatement</p>	<p>The PHA will make all HAP abatements effective the first of the month following the expiration of the PHA specified correction period (including any extension).</p> <p>The PHA will inspect abated units within 5 10 business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.</p>	<p>Realistic time at current staffing levels</p>
<p>8-III.D. PHA RENT REASONABLENESS S METHODOLOGY</p> <p>How Rents Are Determined</p>	<p><i>The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same or similar market area.</i></p> <p>The rent for a unit proposed for HCV 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 HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the PHA may make adjustments to the range of prices to account for these differences.</p> <p>The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).</p> <p>Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three bedroom unit than in a two bedroom).</p> <p>The adjustment must reflect the rental value of the difference—not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rental units are presumed to have functioning roofs).</p> <p>When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: \$500 x 11 months = 5500/12 months = actual monthly rent of \$488.</p> <p><i>If comparable units are unable to be found, the PHA will notify the owner of the rent the PHA cannot approve based upon its analysis of</i></p>	<p>Simplify the process of determining rent reasonableness</p>

	<p><i>rents for comparable units. The owner may submit information about other comparable units in the market area. The PHA will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within 5 business days of the PHA's request for information or the owner's request to submit information.</i></p> <p>The PHA will notify the owner of the rent the PHA can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The PHA will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within 5 business days of the PHA's request for information or the owner's request to submit information.</p>	Give the owners an option if they believe the rent is reasonable based on their knowledge of the market
	Chapter 9: GENERAL LEASING POLICIES	
9-I.E. LEASE AND TENANCY ADDENDUM Lease Form and Tenancy Addendum	The PHA will does not provide a model or standard dwelling lease for owners to use in the HCV program. When landlord chooses to use his or her own lease, The HCV Lease Addendum <i>will be attached to all leases</i> Part B will be required.	Reduce liability and clarify requirement for addendum
Term of Assisted Tenancy	The PHA will not approve an initial lease term of less than one (1) year. <i>Lease term must much that of the HAP contract.</i>	Clarification
PHA Review of Lease	<p><i>The PHA will review the dwelling lease for compliance with all applicable program requirements.</i></p> <p><u><i>PHA Policy</i></u></p> <p><i>If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept missing and corrected information over the phone</i></p> <p><i>Because the initial leasing process is time-sensitive, the PHA will attempt to communicate with the owner and family by phone, fax, or email. The PHA will use mail when the parties can't be reached by phone, fax, or email.</i></p>	Addition of HUD requirement and policy implementing
9-I.G. HAP CONTRACT EXECUTION	<p>Owners who have not previously participated in the HCV program must attend a meeting with the PHA in which the terms of the Tenancy Addendum and the HAP contract will be explained. The PHA may waive this requirement on a case-by-case basis, if it determines that the owner is sufficiently familiar with the requirements and responsibilities under the HCV program.</p> <p>The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the PHA. The PHA will ensure that both the owner and the assisted family receive copies of the dwelling lease.</p> <p>The owner and the PHA will execute the HAP contract. The PHA will not execute the HAP contract until the owner has submitted IRS form W-9. The PHA will ensure that the owner receives a copy of the executed HAP contract.</p>	The lease is between the owner and tenant. MMHA does not distribute it but does maintain a copy in the tenant file
Optional Reporting	<i>If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, the PHA will note the</i>	Clarification of processes

	<p>information in the tenant file, but will not conduct an interim reexamination.</p> <p><i>If a family reports a change that it was not required to report and that would result in a decrease in the tenant rent, the PHA will conduct an interim reexamination. See Section 9-III.D. for effective dates.</i></p> <p>Families may report changes in income or expenses at any time.</p>	
	Chapter 10: MOVING	
10-II.B. INITIAL PHA ROLE [Portability] Applicant Families	<p>In determining whether or not to deny an applicant family permission to move under portability because the PHA lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in section 10-I.B of this chapter. <i>If the PHA does deny the move due to insufficient funding, the PHA will notify HUD in writing within 10 business days of the PHA's determination to deny the move.</i></p>	HUD requirement
Briefing	<p>No formal briefing will be required for a participant family wishing to move outside the PHA's jurisdiction under portability. However, the PHA will provide the family with the same oral and written explanation of portability that it provides to applicant families selected for admission to the program (see Chapter 5).</p> <p>The PHA will provide the name, address, and phone of the contact for the PHA in the jurisdiction to which they wish to move. <i>If there is more than one PHA with jurisdiction over the area to which the family wishes to move, the PHA will advise the family that the family must select the receiving PHA and notify the initial PHA of which receiving PHA was selected.</i></p> <p>The PHA will advise the family that they will be under the PHA's policies and procedures, including <i>screening</i>, subsidy standards, voucher extension policies, and <i>payment standards</i>.</p>	Clarify roles and responsibilities
Voucher Issuance and Term	<p>For participating families approved to move under portability, the PHA will issue a new voucher within 10 business days of the PHA's written approval to move.</p> <p>The initial term of the voucher will be 60 120 days.</p>	Match voucher term for movers within jurisdiction
Voucher Extensions and Expiration	<p>The PHA will approve no extensions to a voucher issued to an applicant or participant family porting out of the PHA'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.</p> <p>To receive or continue receiving assistance under the initial PHA's voucher program, a family that moves to another PHA's jurisdiction under portability must be under HAP contract in the receiving PHA's jurisdiction within 90 60 days following the expiration date of the initial PHA's voucher term (including any extensions). (See below under "Initial Billing Deadline" for one exception to this policy.)</p>	New HUD portability regulations
10-II.C. RECEIVING PHA ROLE Voucher Term	<p>The receiving PHA's voucher will expire <i>on the same date as</i> 30 calendar days from the expiration date of the initial PHA's voucher.</p>	New HUD portability regulations

<p>Administering a Portable Family's Voucher Portability Billing</p>	<p><i>To cover assistance for a portable family that was not absorbed, the receiving PHA bills the initial PHA for housing assistance payments and administrative fees. The amount of the housing assistance payment for a portable family in the receiving PHA's program is determined in the same manner as for other families in the receiving PHA's program.</i></p> <p><i>The receiving PHA may bill the initial PHA for the lesser of 80 percent of the initial PHA's ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee for each program unit under contract on the first day of the month for which the receiving PHA is billing the initial PHA under portability. If the administrative fees are prorated for the HCV program, the proration will apply to the amount of the administrative fee for which the receiving PHA may bill (i.e., the receiving PHA may bill for the lesser of 80 percent of the initial PHA's prorated ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee).</i></p> <p><i>If both PHAs agree, the PHAs may negotiate a different amount of reimbursement.</i></p> <p><u><i>PHA Policy</i></u></p> <p><i>Unless the PHA negotiates a different amount of reimbursement with the initial PHA, the PHA will bill the initial PHA the maximum amount of administrative fees allowed, ensuring any administrative fee proration has been properly applied.</i></p>	<p>New HUD Portability Regulations</p>
	<p>Chapter 11: REEXAMINATIONS</p>	
<p>11-I.B STREAMLINED ANNUAL REEXAMINATIONS</p>	<p><i>HUD permits PHAs to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years the PHA may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or rate of interest. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.</i></p> <p><i>Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.</i></p> <p><u><i>PHA Policy</i></u></p> <p><i>The PHA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. The PHA will document in the file how the determination that a source of income was fixed was made.</i></p> <p><i>If a family member with a fixed source of income is added, the PHA will use third-party verification of all income amounts for that family member.</i></p> <p><i>If verification of the COLA or rate of interest is not available, the PHA will obtain third-party verification of income amounts.</i></p> <p><i>Third-party verification of fixed sources of income will be obtained during the intake process and at least once every three years thereafter.</i></p>	<p>Implement new HUD streamlining regulation to improve administrative efficiency</p>

<p>11-I.C. SCHEDULING ANNUAL REEXAMINATIONS Notification of and Participation in the Annual Reexamination Process</p>	<p>Annual reexaminations will be conducted by mail. Notification of the annual reexamination will be sent by first-class mail and will inform the family of the information and documentation that must be provided to the PHA, and the deadline for providing it. Documents will be accepted by mail, by fax, by e-mail, or in person.</p> <p>In the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, as well as to any alternate address provided in the family's file.</p> <p>An interview will be scheduled if the family requests assistance in providing information or documentation requested by the PHA.</p> <p>If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. If a family does not attend the scheduled interview, the PHA will send a second notification with a new interview date and appointment time.</p> <p><i>If a family fails to attend two scheduled interviews without PHA approval, or if the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record in accordance with policies contained in Chapter 12.</i></p> <p>An advocate, interpreter, or other assistant may assist the family in the interview process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any such third party.</p>	<p>Clarify consequence for noncompliance with requirements</p>
<p>11-I.D. CONDUCTING ANNUAL REEXAMINATIONS</p>	<p><i>Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].</i></p> <p><u>PHA Policy</u></p> <p><i>At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.</i></p>	<p>Adopt HUD guidance</p>
<p>11-II.C. CHANGES AFFECTING INCOME OR EXPENSES PHA-Initiated Interim Reexaminations</p>	<p>Families are required to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect.</p> <p>The PHA will conduct interim reexaminations in each of the following instances:</p> <p>For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the second 12 month exclusion period (50 percent phase-in period).</p> <p>If the family has reported zero income or no earned income, the PHA will <i>conduct an interim reexamination when the family has begun receiving any new income</i> require the family to complete and return a "Zero Income" verification form at the 1st of each month.</p> <p><i>When a family begins receiving income from a previously unreported source, e.g. social security or TANF benefits, or starts</i></p>	<p>Require the reporting of additional income to reduce average HAP and increase number of vouchers that may be leased</p>

	<p><i>or changes a job with a new employer or returns to work after an extended absence.</i></p> <p><i>Any increases in earned income for families participating in the FSS or Homeownership Programs.</i></p> <p>If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.</p> <p>If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.</p> <p>If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.</p> <p>The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.</p>	
<p>Family-Initiated Interim Reexaminations <i>Required Reporting</i></p>	<p>Families are required to report all increases in earned income, including new employment or other sources of income, within 10 business days of the date the change takes effect.</p> <p>The PHA will conduct interim reexaminations in each of the following instances:</p> <p><i>For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the second 12 month exclusion period (50 percent phase-in period).</i></p> <p><i>If the family has reported zero income or no earned income, the PHA will conduct an interim reexamination when the family has begun receiving any new income.</i></p> <p><i>When a family begins receiving income from a previously unreported source, e.g. social security or TANF benefits, or starts or changes a job with a new employer or returns to work after an extended absence.</i></p> <p><i>Any increases in earned income for families participating in the FSS or Homeownership Programs.</i></p> <p>The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.</p> <p>Families are not required to report any other changes in income or expenses.</p>	<p>Require the reporting of additional income to reduce average HAP and increase number of vouchers that may be leased</p>
<p>11-II.D. PROCESSING THE INTERIM</p>	<p>Families are require to report all increases in earned income, including new employment, within 10 business days of the date the change takes effect as required by 11-II.D. Processing Interim Reexaminations.</p>	<p>Consistency</p>

REEXAMINATION Method of Reporting	<p>The family must notify the PHA of changes either or in writing within 10 days of the event. <i>To initiate an interim reexamination for a decrease in income the family must notify the PHA of changes in writing by the 20th day of the month.</i></p> <p>Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family may be required to attend.</p> <p>Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 10 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, by e-mail, or in person.</p>	<p>To insure appropriate documentation is maintained in the file and that changes can be verified and processed prior to HAP checks being written</p>
12-I.D. MANDATORY TERMINATION OF ASSISTANCE <i>Use of Illegal</i> <i>Drugs and Alcohol</i> <i>Abuse</i>	<p>Chapter 12: TERMINATION OF ASSISTANCE AND TENANCY</p> <p>The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p>The PHA will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.</p> <p><i>Currently engaged in</i> is defined as any use of illegal drugs during the previous six months.</p> <p>The PHA will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.</p> <p><i>A record of arrest(s) will not be used as the basis for the termination or proof that the participant engaged in disqualifying criminal activity.</i></p> <p>In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.</p>	<p>Implementation of the new guidance on the use of arrest records</p>
Drug-Related and Violent Criminal Activity	<p>The PHA will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.</p> <p>The PHA will consider all credible evidence, including but not limited to, any record of arrests and/or convictions of household members related to drug-related or violent criminal activity, and any eviction or notice to evict based on drug-related or violent criminal activity.</p> <p><i>A record of arrest(s) will not be used as the basis for the termination or proof that the participant engaged in disqualifying criminal activity.</i></p> <p>In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.</p>	<p>Implementation of the new guidance on the use of arrest records</p>
Other Authorized	The PHA will not terminate a family's assistance because of the family's	

Reasons for Termination of Assistance	<p>failure to meet its obligations under the Family Self-Sufficiency program.</p> <p>The PHA will terminate a family's assistance if:</p> <p>The family has failed to comply with any family obligations under the program. See Exhibit 12-1 for a listing of family obligations and related PHA policies.</p> <p>Any family member has been evicted from federally-assisted housing in the last five years.</p> <p>Any PHA has ever terminated assistance under the program for any member of the family.</p> <p>Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.</p> <p>The family currently owes rent or other amounts to any PHA in connection with <i>Section 8 or public housing assistance under the 1937 Act</i>. The HCV, Certificate, Moderate Rehabilitation or public housing programs (Iowa State Law statute of limitations will supersede this denial (10 years))</p> <p>The family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease. (Iowa State Law statute of limitations will supersede this denial (10 years))</p> <p>The family has breached the terms of a repayment agreement entered into with the PHA. (Iowa State Law statute of limitations will supersede this denial (10 years))</p> <p>A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.</p> <p><i>Abusive or violent behavior towards PHA personnel</i> includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.</p> <p><i>Threatening</i> refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence. <i>Including spoken or written words tending to intimidate or menace other involved, or suggested without being directly or explicitly stated. A declaration of intention or determination to inflict punishment or injury, in retaliation for, or conditionally upon, some action or course. Sending threatening or harassing emails, instant messages, or website entries. Repeated attempts to target a specific PHA staff member by directly contacting them, or indirectly using or disseminating their personal information, causing them distress, fear, or anger.</i></p>	<p>Currently funded programs</p> <p>Iowa statute does not supersede the HUD requirement to collect overpayment</p> <p>Expanded to include the definition of cyber stalking</p>
Family Absence from the Unit	<p>If the family is absent from the unit for more than 180 consecutive calendar days, <i>or more than 30 days without providing notice to the PHA</i>, the family's assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F.</p>	<p>Require notification will be absent from unit to avoid termination</p>

Chapter 13: OWNERS		
13-I.A. OWNER RECRUITMENT AND RETENTION Retention	<p>All PHA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners.</p> <p>The PHA will provide owners with a handbook that explains the program, including HUD and PHA policies and procedures, in easy-to-understand language.</p> <p>The PHA will give special attention to helping new owners succeed through activities such as:</p> <ul style="list-style-type: none"> Providing the owner with a designated PHA contact person. Coordinating inspection and leasing activities between the PHA, the owner, and the family. Initiating telephone contact with the owner to explain the inspection process, and providing an inspection booklet and other resource materials about HUD housing quality standards. Providing other written information about how the program operates, including answers to frequently asked questions. 	<p>We do not have a handout to distribute but verbally explain the program to all landlords</p> <p>The inspection process is explained by the inspector at the initial inspection</p>
13-I.D. OWNER QUALIFICATIONS Legal Ownership of Unit	<p><i>The PHA will only enter into a contractual relationship with the legal owner of a qualified unit. No tenancy will be approved without acceptable documentation of legal ownership (e.g., deed of trust, proof of taxes for most recent year).</i></p> <p>Landlord will sign a Section 8 Landlord Certification for each property leased through the HCV program.</p>	<p>Limit liability and address requirements of program</p> <p>MMHA does not have certification</p>
13-II.E. HAP CONTRACT TERM AND TERMINATIONS	<p>The PHA may elect to terminate the HAP contract in each of the following situations:</p> <ul style="list-style-type: none"> Available program funding is not sufficient to support continued assistance for families in the program [24 CFR 982.454]; The unit does not meet HQS size requirements due to change in family composition [24 CFR 982.403] – see chapter 8; The unit does not meet HQS local code [24 CFR 982.404] – see chapter 8; The family breaks up [HUD Form 52641] – see chapter 3; The owner breaches the HAP contract [24 CFR 982.453(b)] – see Section 13-II.D. 	<p>Reflects the use of City rental code for assisted properties</p>
13-II.G. FORECLOSURE	<p>Families receiving HCV assistance are entitled to certain protections set forth under the Protecting Tenants at Foreclosure Act (PTFA). Specifically, the HAP contract now contains language stating that in the case of any foreclosure, the immediate successor in interest in the property pursuant to the foreclosure will assume such interest subject to the lease between the prior owner and the tenant, and to the HAP contract between the prior owner and the PHA for the occupied unit. This provision of the HAP contract does not affect any state or local law that provides longer time periods or other additional protections for tenants.</p> <p>If the PHA learns that a property is in foreclosure, it must take the following actions:</p> <ul style="list-style-type: none"> • Make all reasonable efforts to determine the status of the foreclosure 	<p>A temporary regulation adopted during the housing crisis which has expired</p>

and ownership of the property. (Further guidance on how to obtain this information can be found in Notice PIH 2010-49.)

- ~~Continue to make payments to the original owner until ownership legally transfers in accordance with the HAP contract.~~
- ~~Attempt to obtain a written acknowledgement of the assignment of the HAP contract from the successor in interest. The written agreement should include a request for owner information, such as a tax identification number, and payment instructions from the new owner. Even if the new owner does not acknowledge the assignment of the HAP contract in writing, the assignment is still effective by operation of law.~~
- ~~Inform the tenant that they must continue to pay rent in accordance with the lease, and if the successor in interest refuses to accept payment or cannot be identified, the tenant should pay rent into escrow. Failure to pay rent may constitute an independent ground for eviction.~~
- ~~Inform the tenant in the event that the PHA is unable to make HAP payments to the successor in interest due an action or inaction by the successor that prevents such payments (e.g., rejection of payments or failure to maintain the property according to HQS), or due to an inability to identify the successor. The PHA should also refer the tenant, as needed, to the local legal aid office in order to ensure adequate protection of the tenant's rights and enforcement of the successor in interest's performance under the HAP contract.~~
- ~~Make reasonable inquiries to determine whether the unit, in addition to having a tenant receiving HCV assistance, will be or has been assisted under the Neighborhood Stabilization Program (NSP). (For further guidance on cases in where the units have been assisted under the NSP, see Notice PIH 2010-49.)~~
- ~~PHAs are also required to notify HCV applicants who have been issued a voucher, participant heads of household, and current and prospective owners of HCV-assisted housing of the protections afforded to tenants under the PTFA.~~

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~~The PHA will provide all HCV applicants that have been issued a voucher with information regarding the PTFA at admission (see Section 5 I.B) and to participant heads of household at annual reexamination.~~

~~The PHA will provide information regarding the PTFA to prospective owners when they begin their participation in the HCV program, and to current HCV owners one time with the monthly HAP.~~

- ~~Note that the foreclosure provision of the HAP contract and additional tenant protections under the Protecting Tenants at Foreclosure Act will sunset December 31, 2014.~~
- ~~See Section 12 III.B for a discussion of foreclosure as it pertains to owner termination of tenancy.~~

Chapter 14: PROGRAM INTEGRITY		
	No Changes	
Chapter 15: SPECIAL HOUSING TYPES		
INTRODUCTION	<p><i>Families will be permitted to use the homeownership or shared housing options.</i></p> <p>Families will not be permitted to use any <i>other</i> special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.</p>	To correct current operations
15-VI.B. SPECIAL POLICIES FOR MANUFACTURED HOME OWNERS WHO LEASE A SPACE	<i>The PHA will not provide assistance with lot rent for families who own a manufactured home.</i>	Processing a new voucher is timely but the assistance calculation often results in no payment
15-VII.B. FAMILY ELIGIBILITY	<p>The PHA will not establish a higher minimum income standard for disabled and/or non-disabled families</p> <p>Families will be considered “continuously employed” if the break in employment does not exceed four months.</p> <p>The PHA will count self-employment in a business when determining whether the family meets the employment requirement.</p> <p>The PHA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:</p> <p><i>The family has been assisted for not less than 12 consecutive months</i></p> <p>The family has had no family-caused violations of HUD’s Housing Quality standards within the past year.</p> <p>The family is not within the initial one-year period of a HAP Contract.</p> <p>The family does not owe money to the PHA.</p> <p>The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year.</p>	Indication of compliance with regulations and stability
15-VII.E. ADDITIONAL PHA REQUIREMENTS FOR SEARCH AND PURCHASE	<p>The family will be allowed 120 days to identify a unit and submit a sales contract to the PHA for review. The family will be allowed an additional 120 days to close on the home. PHAs may grant extensions to either of these periods for good cause. The length of the extensions(s) will be determined on a case-by-case, but in no case will an extension exceed 125 days. The maximum amount of time a family will be given to locate and complete the purchase of a home under the homeownership option is 365 days.</p> <p>During these periods, the family will continue to receive HCV rental assistance in accordance with any applicable lease and HAP contract until the family vacates the rental unit for its purchased home.</p> <p>All requests for extensions must be submitted in writing to the PHA prior to the expiration of the period for which the extension is being requested. The PHA will approve or disapprove the extension request within 10 business days. The family will be notified of the PHA’s decision in writing.</p>	If a family is ready

	<p>The family will be required to report their progress on locating and purchasing a home to the PHA every 30 days until the home is purchased.</p> <p>If the family cannot complete the purchase of a unit within the maximum required time frame, and is not receiving rental assistance under a HAP contract at the time the search and purchase time period expires, the family will be required to reapply for assistance and placed on the HCV waiting list.</p>	to purchase a home it is unnecessary for MMHA to micromanage the process
15-VII.F. HOMEOWNERSHIP COUNSELING	<p><i>Housing counseling must be completed not more than 12 months prior to closing.</i></p> <p>Families may will not be required to participate in ongoing counseling after commencement of homeownership assistance.</p>	To coincide with 365 days to purchase Flexibility based on observed needs of the assisted family
15-VII.G. HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER	<p>When the family locates a home they wish to purchase and submits a copy of their purchase offer/contract, the PHA will conduct a housing quality standards (HQS) inspection within 10 business days. Any items found not to meet HQS <i>or local building code</i> must be repaired before the unit can be determined eligible for the homeownership program.</p> <p>The family must hire an independent, <i>licensed</i> professional inspector, whose report must be submitted to the PHA for review. No specific credentials are required. The inspector may not be a PHA employee.</p> <p>The PHA will review the professional report in a timely fashion and, based on the presence of major physical problems, may disapprove the purchase of the home.</p>	<p>Housing should be of a quality at least equal to that of assisted rental units</p> <p>Industry standard/protect tenant</p>
15-VII.H. FINANCING	<p>As a check against predatory lending, the PHA will review the financing of each purchase transaction, including estimated closing costs. The PHA will review the loans for features, such as balloon payments, adjustable rate mortgages, and unusually high interest rates. The PHA will not approve “seller financing” or “owner-held” mortgages. Beyond these basic criteria, the PHA will rely on the lenders to determine that the loan will be affordable to program participants.</p> <p>Financing for purchase of a home under the <i>HCV Section 8</i> homeownership will be insured or guaranteed by the state or Federal government; comply with secondary mortgage market underwriting requirements; or comply with generally accepted private sector underwriting standards.</p> <p><i>The PHA will approve a family’s request to utilize its Family Self-Sufficiency escrow account for down payment and/or closing costs when purchasing a unit under the HCV homeownership option.</i></p> <p>The PHA has no FSS program.</p>	Reflect MMHA current programs and options
15-VII.I. CONTINUED ASSISTANCE REQUIREMENTS; FAMILY OBLIGATIONS	<p><i>The PHA will not conduct inspections following closing unless requested by the homeowner.</i></p> <p>Any inspection the PHA conducts after the initial inspection will be done on an advisory basis. The family will be encouraged to make the repairs, but will not be required to do so as a condition of ongoing assistance.</p>	If there is no requirement to make repairs this is an inefficient use of staff
15-VII.K. HOMEOWNERSHIP	The PHA’s housing assistance payment will be paid directly to the <i>owner</i> lender unless the <i>homebuyer</i> or mortgage company <i>requests</i> refuses to	Most lenders require the owner

ASSISTANCE PAYMENTS AND HOMEOWNERSHIP EXPENSES	accept payments be made <i>directly to the mortgage company from more than one source. In such case, the PHA's housing assistance payment will be paid directly to the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family. Any housing assistance amount over the required mortgage payment, with the exception of utility reimbursements, will be paid directly to the homebuyer. Any utility reimbursement will be paid directly to the utility company.</i>	to make the full payment
	<p>The PHA will allow the following homeownership expenses:</p> <p>Monthly homeownership payment. This includes principal and interest on initial mortgage debt, taxes and insurance, and any mortgage insurance premium, if applicable.</p> <p>Utility allowance. The PHAs utility allowance for the unit, based on the current HCV utility allowance schedule.</p> <p>Monthly maintenance allowance. <i>The monthly maintenance allowance will be \$25</i></p> <p>Monthly major repair/replacement allowance. <i>The monthly major repair/replacement allowance will be \$25</i></p>	Add allowance amount for HUD required allowances
15-VII.M. MOVING WITH CONTINUED ASSISTANCE	<p>For families participating in the homeownership option, requests to move will be approved and/or denied in accordance with PHA policies in Chapter 10.</p> <p>The PHA will not require additional <i>housing</i> counseling of any families who move with continued assistance.</p>	Client must be in good standing to move so additional counseling seems punitive
Chapter 16: PROGRAM ADMINISTRATION		
16-II.B. PAYMENT STANDARDS	<p>The PHA had established payment standards for all unit sizes, and for the entire jurisdiction, at</p> <p><u>PHA Policy</u></p> <p>110 percent of the published FMR for SRO & one bed room</p>	Maintain flexibility within regulatory guidelines
16-IV.B. REPAYMENT POLICY General Repayment Agreement Guidelines for Families <i>Down Payment Requirement</i>	<p><i>The PHA will not require a down payment at the initiation of a repayment agreement.</i></p> <p>NONE</p>	Current practice
16-III.B. REPAYMENT POLICY General Repayment Agreement Guidelines <i>Down Payment Requirement</i>	<p><i>The PHA does not require a down payment prior to entering into a repayment agreement.</i></p> <p>Before executing a repayment agreement with a family, the PHA will generally require a down payment of 10 percent of the total amount owed. If the family can provide evidence satisfactory to the PHA that a down payment of 10 percent would impose an undue hardship, the PHA may, in its sole discretion, require a lesser percentage or waive the requirement.</p>	Reflects current practice
16-IX.F. NON-CITIZEN VICTIMS (VAWA)	<p><i>A non-citizen applicant or resident/tenant is eligible for protection under VAWA is the victim of a U.S. Citizen or Lawful Permanent Resident.</i></p> <p><u>PHA Policy</u></p> <p><i>A victim of crimes covered under VAWA may self-petition that they are in "satisfactory immigration status" and eligible to receive</i></p>	Required by new HUD notice

	<p><i>financial assistance when applying for assistance or continued assistance by submitting INS Form I-360, I-130, or Form 797.</i></p> <p><i>"Satisfactory immigration status" means an immigration status which does not make the individual ineligible for financial assistance.</i></p> <p><i>The PHA will verify such immigration status in the Department of Homeland Security Systematic Alien Verification for Entitlements (SAVE) System. The SAVE system will provide one of two confirmations: (1) the VAWA self-petition is verified (petitioner is eligible and no additional documentation of abuse may be requested); or (2) the I-130 is verified and the petitioner must provide the PHA evidence of "battery or extreme cruelty."</i></p> <p><i>Upon final determination of immigration status the determination is to deny the petition, the PHA must alert the petitioner and take appropriate action to terminate assistance.</i></p>	
	Chapter 17: Project-Based Vouchers	
17-II.B. OWNER PROPOSAL SELECTION PROCEDURES PHA Notice of Owner Selection	<p>Within 10 business days of the PHA making the selection, the PHA will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner. <i>Selected owners will be approved at a public meeting of the Board of Commissioners.</i></p> <p>In addition, the PHA will publish its notice for selection of PBV proposals for two consecutive days in the same newspapers and trade journals the PHA used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. The PHA will also post the notice of owner selection on its electronic web site.</p> <p>The PHA will make available to any interested party its rating and ranking sheets and documents that identify the PHA basis for selecting the proposal. These documents will be available for review by the public and other interested parties for one month after <i>Board approval publication of the notice of owner selection.</i> The PHA will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.</p> <p>The PHA will make these documents available for review at the PHA during normal business hours. The cost for reproduction of allowable documents will be \$.25 per page.</p>	Approval of a selected developer is done at an open meeting there is minimal benefit to direct or published notification, the latter of which is also expensive
17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT Exceptions to 25 Percent per Project Cap	<p><i>The PHA will develop housing for occupancy by disabled families in need of services. The families must receive the services, and successfully complete the service program, to be eligible for continued occupancy. Families that do not continue to receive the services or complete the required service program will be terminated in accordance with the PHA policies in Section 12-II.F.</i></p> <p><i>The following types of services will be provided depending on the needs of the family:</i></p> <p><i>Transportation for activities such as grocery shopping, attending medical and dental appointments;</i></p> <p><i>Supervised taking of medications;</i></p> <p><i>Treatment for drug rehabilitation in the case of current abusers;</i></p>	Identify how a project qualifies for excepted units based on HUD guidance

	<p><i>Treatment for alcohol addiction in the case of current abusers;</i></p> <p><i>Training in housekeeping and homemaking activities;</i></p> <p><i>Family budgeting;</i></p> <p><i>Child care;</i></p> <p><i>Parenting skills;</i></p> <p><i>Computer labs; and</i></p> <p><i>Work skills development and job training.</i></p> <p>On a quarterly basis, the PHA will monitor all families that are receiving services to determine if such families will be allowed to continue receiving PBV assistance. The PHA will require families receiving services to provide written evidence from each service provider that the family has received all of the required services stated in the statement of family obligations or FSS contract of family participation. Alternatively, each service provider will submit a report to the PHA identifying the services received by each family, and the PHA will check to see if all services required in the statement of family obligation or FSS contract of participation were received.</p> <p>The PHA will provide PBV assistance for excepted units.</p>	
Promoting Partially-Assisted Projects	<p><i>The PHA will impose a 50 percent cap on excepted units in multifamily projects. This cap may be lifted to 100 percent for projects with fewer than 25 units.</i></p> <p>The PHA will not provide assistance for excepted units. Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per project.</p>	Encourage mixed population developments
17-II.G. SITE SELECTION STANDARDS Compliance with PBV Goals, Civil Rights Requirements, and HQS Site Standards	<p>It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.</p> <p>However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will <i>improve housing options and</i> complement other local redevelopment activities/goals designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:</p> <p>A census tract in which the proposed PBV development will be located in a HUD designated Enterprise Zone, Economic Community, or Renewal Community;</p> <p>A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;</p> <p>A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;</p> <p>A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;</p> <p>A census tract where there has been an overall decline in the</p>	These do not apply to the MMHA service area

	<p>poverty rate within the past five years; or</p> <p>A census tract where there are meaningful opportunities for educational and economic advancement.</p>	
17-III.D. INSPECTING UNITS <i>Annual/Biennial Inspections</i>	<p>At least <i>once every 24 months annually</i> during the term of the HAP contract, the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this inspection requirement.</p> <p><u><i>PHA Policy</i></u></p> <p><i>The PHA will inspect on a biennial basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS and local building codes.</i></p>	Application of biennial inspection option to project-based units
17-VI.C. ORGANIZATION OF THE WAITING LIST	<p>The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA currently has waiting lists for the following PBV projects:</p> <p>Fulton Place Harrison Lofts</p>	Add Harrison Lofts which was awarded vouchers late 2015 and is under construction
17-VI.D. SELECTION FROM THE WAITING LIST <i>Preferences</i>	<p>The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, qualifying families for “excepted units,” mobility impaired persons for accessible units). The PHA will not offer any additional preferences for the PBV program or for particular PBV projects or units. <i>With the exception of “excepted units” all PBV programs will utilize the same preferences adopted for the tenant-based voucher program as identified in Chapter 4.</i></p>	
17-VI.F. OWNER SELECTION OF TENANTS <i>Filling Vacancies</i>	<p>The owner must notify the PHA in writing (mail, fax, or e-mail) within 5 business days of learning about any vacancy or expected vacancy.</p> <p>The PHA will make every reasonable effort to refer families to the owner within 30 calendar <i>40 business</i> days of receiving such notice from the owner.</p>	A more reasonable time frame to pull families and determine eligibility
17-VII.B. LEASE <i>Continuation of Housing Assistance Payments</i>	<p><i>Housing assistance payments shall continue until the tenant rent equals the rent to owner. The cessation of housing assistance payments at such point will not affect the family's other rights under its lease, nor will such cessation preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within 180 days following the date of the last housing assistance payment by the PHA. After the 180-day period, the unit shall be removed from the HAP contract pursuant to 24 CFR 983.211.</i></p> <p><u><i>PHA Policy</i></u></p> <p><i>If a participating family receiving zero assistance experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the PHA of the change and request an interim reexamination before the expiration of the 180-day period.</i></p>	<p>Section seemed to be omitted previously</p> <p>Reflects non project-based voucher policy</p>
17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP	<p><i>The PHA will allow families who initially qualified to live in an excepted unit to remain when circumstances change due to circumstances beyond the remaining family members' control.</i></p> <p><i>In all other cases, when the PHA determines that a family no longer meets the criteria for a “qualifying family” in connection with the 25 percent per project cap exception, the PHA will provide written notice to</i></p>	Fulton Place are accepted units and the policy needs to address how these units will be addressed

the family and owner within 10 business days of making the determination. The family will be given 30 days from the date of the notice to move out of the PBV unit. If the family does not move out within this 30-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 30-day period.

The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

The PHA may refer other eligible families to the excepted units. However, if there are no eligible families on the waiting list and the owner does not refer eligible families to the PHA, the PHA will amend the HAP contract to reduce the total number of units under contract.

~~*The PHA will not provide PBV assistance for accepted units.*~~