

2023 Admin Plan Suggested Changes

1. Throughout the entire Administrative Plan:
Previous: UPCS-V Uniform Physical Condition Standards for Vouchers
New: Current Approved HUD Inspection Protocol.
Reason: Replacing UPCS-V with Current Approved HUD Inspection Protocol. HUD continues to implement various inspection protocol demonstrations.
2. Pg. GL-3, **CONGREGATE HOUSING.**
Remove: UPCS-V
Add: Current Approved HUD Inspection Protocol
Reason: Replacing UPCS-V with Current Approved HUD Inspection Protocol
3. Pg. GL-3
Remove: Uniform Physical Condition Standards for Vouchers (UPCS-V)
Add: **CURRENT APPROVED HUD INSPECTION PROTOCOL:** The U.S. Department of Housing and Urban Development (HUD) continues to develop various protocols to provide Public Housing Agency (PHA) Staff, Inspectors, Owners, and Tenants with an improved method for the inspection of Housing Choice Voucher (HCV) program units. Additionally, HUD intends the protocols provide HUD, Owners, and Tenants a deeper insight to the condition of HCV units.
Reason: Replacing UPCS-V with Current Approved HUD Inspection Protocol. HUD continues to implement various inspection protocol demonstrations.
4. Pg. GL-4
Add: **CURRENT GROSS INCOME.** The gross income (total income without any deductions or allowances) the family expects to receive in the next 12 months based on a review of their current income. Current generally refers to the period approximately 180 days prior, or more recent, to the household's effective date.
Reason: Include definition from MTW Addendum.
5. Pg. GL-9
Add: **PRIOR YEAR GROSS INCOME.** See definition of Retrospective Gross Income.
Reason: Include definition from MTW Addendum.
6. Pg. GL-10
Add: **RETROSPECTIVE (PRIOR YEAR) GROSS INCOME.** The gross income (total income without any deductions or allowances) received by the household during the prior 12 months ending 120 days before the recertification effective date. The period always begins on the first day of the month and ends on the last day of the month. The retrospective period is fixed; it does not change or update after it is communicated to the household. All income received during this time period will be counted, regardless of length of time or amount received, with the exception of HUD allowable exclusions and household members who turned 18 during the retrospective period. Earned income received by a household member turning 18 during the retrospective period will not be included.
Reason: Include definition from MTW Addendum.

7. Pg. GL-11

Add: **STANDARD RENT HOUSEHOLDS.** TTP is determined by the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income;
- 10 percent of the family's monthly income;
- If the family is receiving payments for welfare assistance from a public agency and a part of those payments is specifically designated to meet the family's housing costs, the portion of those payments which is so designated; or
- The minimum rent.

Reason: Include definition from MTW Addendum.

8. Pg. GL-11

Add: **TIERED RENT HOUSEHOLDS.** Total Tenant Payment (TTP) is determined by which tier the household's retrospective annual gross income (current households) and current gross income (new admissions) falls into. Income recertifications occur triennially. Households cannot have interim recertifications, but may qualify for temporary hardships to reduce their TTP.

Reason: Include definition from MTW Addendum.

9. Pg. GL-13

Add: **WORK-ABLE FAMILY.** A family whose head (including co-head), spouse, or sole member is a person who is not considered disabled (see definition of "disabled person") and is less than 62 years of age.

Reason: Include definition from MTW Addendum.

10. Pg. 2-8, Other Criteria for Admissions

Previous: Persons who have been convicted of drug-related criminal activity or violent criminal activity are suitable for housing three (3) years after the most recent release date that can be determined from either 1) sentence or 2) probation or 3) parole.

New: Persons who have been convicted of drug-related criminal activity (excluding minor misdemeanors) or violent criminal activity are suitable for housing three (3) years after the most recent release date that can be determined from either 1) sentence or 2) probation or 3) parole.

Reason: To allow eligibility to those individuals who have minor misdemeanors for drug-related offenses.

11. Pg. 4-3, Local Preferences, #5 Full Term First Birthday

Previous: (This preference will be capped at 20 participants across all programs).

New: (This preference will be capped at 30 participants across all programs).

Reason: To match current Full Term First Birthday program size.

12. Pg. 4-4. Rent Burden, Homeless/Substandard Preference, A, b, ii:

Previous: The average monthly payments the family actually made for these utilities in the most recent 12-month period, or if information is not obtainable for the entire period, the average of at least the past three months.

New: The most recent month's cost of utilities owed by the family. If rent burden cannot be determined by current utility cost, then the average monthly payments the family actually made for these utilities in the most recent 12-month period, or if information is not obtainable for the entire period, the average of at least the past three months.

Reason: To match ACOP and current practice.

13. Pg. 4-6, G. Targeted Funding

Remove: (if awarded)

Reason: Mainstream vouchers were awarded to AMHA in 2020.

14. Pg. 4-7, Local Preferences

Previous: Full Term First Birthday Preference (Capped at 20 participants)

New: Full Term First Birthday Preference (Capped at 30 participants)

Reason: To match current Full Term First Birthday program size.

15. Pg. 6-13, Minimum Income

Previous: There is no minimum income requirement. Families who report zero income are required to complete a written certification every year.

New: There is no minimum income requirement. Families who report zero income are required to complete a written certification at their annual or triennial income recertification and during other reported changes in income as needed.

Reason: Households that will be on a triennial recertification cycle will not be required to complete a zero income certification annually.

16. Pg. 7-11, Verification of Legal Identity, bottom of bulleted list under documents acceptable for minors

Add: Any other state, local, national, or international official documents containing a birth date of comparable reliability.

Reason: To match the document options for adults.

17. Pg. 7-14, Verification of Social Security Numbers, after last bullet point

Add: An original document issued by a federal or state government agency, which contains the name of the individual and the SSN of the individual, along with other identifying information of the individual

Reason: To align with PIH Notice 2018-24 and 24 CFR 5.216.

18. Pg. 9-2, B. Eligible Types of Housing

Previous: The PHA will approve any of the following types of housing in the voucher program:

New: The PHA will approve any of the following types of housing in the voucher program. Some units may only be eligible in cases of a reasonable accommodation. See Chapter 19, Special Housing Types, of this plan for further details.

Reason: Clarification to align with Chapter 19 of the Administrative Plan.

19. Pg. 12-4, Interim Reexamination Policy

Previous: All household members with zero income or fully excluded income (24 CFR 5.609) who subsequently obtain income will be required to report

within 10 calendar days and re-certify.

New: Households reporting less than \$2000 annually as income, who experience an increase in income will be required to report, in writing, within 10 calendar days and recertify.

Reason: Change interim policy to match public housing.

20. Pg. 12-4, Interim Reexamination Policy

Remove: A person with income joins the household.

Reason: This scenario is already covered by the previous bullet point, “the composition of the household changes in any way.”

21. Pg. 12-4, Interim Reexamination Policy, Bullet point #6:

Add: “regardless if the leave is paid or unpaid”

Reason: For clarification, that returning to the same job warrants an income change under any circumstance.

22. Pg. 19-7 through pg. 19-11, Section F HOMEOWNERSHIP

Remove: from bottom of pg. 19-6 starting with “Monthly Homeownership Assistance Payments” through last bullet on “Homeownership Counseling Requirements” on page 19-11

Reason: No longer applicable, as it pertains to new Homeownership Voucher holder requirements.

23. Pg. 19-12

Remove: PHA Search and Purchase Requirements [24 CFR 982.629]

The PHA has established the maximum time that will be allowed for a family to locate and purchase a home. The family will be provided 120 calendar days from the date of homeownership voucher issuance to locate, and purchase, a home.

The PHA will require periodic reports on the family’s progress in finding and purchasing a home.

If the family is unable to purchase a home within the maximum time limit, the PHA will allow continued assistance in current unit or issue a rental voucher.

Reason: No longer applicable, as it pertains to new Homeownership Voucher holders.

24. Pg. 19-12, Inspection and Contract through Predatory Lending Safeguards

Move: Sections on Inspection and Contract, Financing, and Predatory Lending Safeguards to pg. 19-17 at the end of the Moving with Continued Assistance section.

Reason: This information is only applicable to current Homeownership voucher holders that purchase a new home now that AMHA is no longer issuing new Homeownership vouchers.

25. Pg. 19-16, Homeownership Assistance Payments and Homeownership Expenses

Remove: In order to determine the initial homeownership assistance payment, the PHA will conduct a reexamination to bring a homeownership family’s income current. For the initial homeownership assistance payment, the timely report for increase in income

procedure does not include the homeownership family, as the HCVP and lender income calculated for the family must be considered.

Reason: No longer applicable, as it pertains to new Homeownership Voucher holders.

26. Pg. 20-1, AMHA’s PBV Commitments and Priorities

Previous: Work with the community to identify and serve populations with particular housing needs, including but limited to the provision of supportive services to promote self-sufficiency, supportive housing for families with disabilities and supportive services that are geared towards aiding the homeless or those at risk of being homeless.

New: Work with the community to identify and serve populations with particular housing needs, including, but **not** limited to, the provision of supportive services to promote self-sufficiency, supportive housing for families with disabilities and supportive services that are geared towards aiding the homeless or those at risk of being homeless.

Reason: Correction to wording

27. Pg. 20-8, Preferences, Full Term First Birthday

Previous: This preference will be capped at 20 participants across all programs.

New: This preference will be capped at 30 participants across all programs.

Reason: To match current Full Term First Birthday program size.

28. MTW Addendum, throughout

Add: For each waiver, added submitted date, expected approval date, and approval status.

Reason: To maintain accurate records of all MTW waivers applied for.

29. Pg. MTW-1, first paragraph

Previous: AMHA has submitted all waivers in this addendum to HUD for approval. Upon approval, all waivers will be effective July 1, 2022 unless otherwise stated by HUD.

New: AMHA has submitted all waivers in this addendum to HUD for approval. Each waiver includes the date it was submitted, expected approval date, and approval status.

Reason: Adding additional waivers with other effective dates. Add planned effective dates to all waivers through MTW addendum for tracking purposes.

30. Pg. MTW-3, under current chart

Add:

AMHA Summary List of HCVP Waivers for 1/1/23 Supplement								
Waiver	Program	Safe Harbor Waiver	Agency Specific Waiver	Impact Analysis	Hardship Policy	Type of Waiver	Supplement Section	HCVP Administrative Plan Chapter
Alternative reexamination schedule for some elderly/disabled households (triennial)	PH & HCVP			Y	Y	MTW Waiver - 3a. & 3b.	C.3 Reexaminations	6, 12
Standardized medical deduction	PH & HCVP			Y	Y	MTW Waiver - 1.t., 1.u.	C.1 Tenant Rent Policies	3, 6, 7, 12

Remove third party requirement for inspections for tenant-based voucher units AMHA owns, manages, or controls	HCVP		Y	Y	Y	Agency Specific Waiver	E. Agency Specific Waivers	10
Remove third party requirement for rent reasonableness tests for tenant-based voucher units AMHA owns, manages, or controls	HCVP		Y	Y	Y	Agency Specific Waiver	E. Agency Specific Waivers	9, 11

Reason: Listing of waivers for 1/1/23 MTW Supplement.

31. Pg. MTW-3, Tiered Rent Waivers

Previous: “admitted during the alternative rent enrollment period (expected to be 8/1/22-7/31/23).”

New: “admitted during the alternative rent enrollment period (expected to be 9/1/22-8/31/23).”

Reason: Updating timeline based on the Tiered Rent Demonstration.

32. Pg. MTW-4, Tiered Rent

Add: Following the enrollment period described above, all newly admitted eligible families (head of household, co-head or spouse is not disabled or age 56 or older) will participate in tiered rent, elimination of deductions, and an alternative re-examination schedule as described in this section.

Reason: Continuation of tiered rent policies for new admissions.

33. Pg. MTW-4, Tiered Rent

Remove: “randomly”

Reason: New households assigned to tiered rents after the Tiered Rent Demonstration enrollment period will not be randomly assigned. All eligible households will have their rent portion determined using the tiered rent model.

34. Pg. MTW-6, Elimination of Deductions

Add: (dependent deductions, childcare deductions, or Earned Income Disallowance)

Reason: Explanation of which deductions were eliminated.

35. Pg. MTW-7, Alternative Reexamination Schedule for Households, at the start of the first full paragraph

Add: Work-able households:

Reason: To differentiate between triennial reexaminations for work-able households and elderly/disabled households.

36. Pg. MTW-7, Alternative Reexamination Schedule for Households, at the end of the section

Add: Elderly/disabled households: If a household meets the following three criteria, it will be enrolled in triennial reexaminations.

- the head of household, co-head, and/or spouse is elderly or disabled,

- the only current income in the household is fixed income (e.g., social security, pension), and
- there are no minors in the household.

For these households, the standard rent calculation method will be used and households will continue to receive the elderly/disabled allowance and be eligible to claim unreimbursed medical expenses, if applicable. If a household's income increases in between triennial reexaminations, the household's rent will not increase. The households may request an interim reexamination for a decrease in income in accordance with Chapter 12 of this plan. Triennial reexaminations for these households are expected to begin in 2024. At that time, all newly admitted households who meet the above criteria will also be enrolled in triennial reexaminations.

Reason: New waiver for 2023 to achieve greater cost effectiveness in federal expenditures, improve administrative efficiencies, and lessen the burden on these elderly/disabled households.

37. Pg. MTW-9, After Remove Third Party Inspection Requirement for PBV Units AMHA Owns, Manages, or Controls

Add: Remove Third Party Requirement for Inspections for Tenant-Based Voucher Units AMHA Owns, Manages, or Controls

Submitted: 10/4/22, Expected Approval: 1/1/23, Pending Approval

Waives certain provisions of section 8(o)(11) of the 1937 Housing Act and 24 CFR 982.352(b)(iv).

AMHA will no longer require a third party to conduct inspections at tenant-based properties in which AMHA has an interest and a voucher holder is residing. AMHA will follow the inspection process utilizing the current HUD inspection method and quality control process that are used for all other properties. Households will be able to request a special/complaint inspection or review by a supervisor as needed.

Reason: New waiver for 2023 to achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting inspections.

38. Pg. MTW-9, After Remove Third Party Requirement for Rent Reasonableness Tests for Project-Based Voucher (PBV) Units AMHA Owns, Manages, or Controls

Add: Remove Third Party Requirement for Rent Reasonableness Tests for Tenant-Based Voucher Units AMHA Owns, Manages, or Controls

Submitted: 10/4/22, Expected Approval: 1/1/23, Pending Approval

Waives certain provisions of 24 CFR 982.352(b).

AMHA will no longer require a third party to conduct rent reasonableness tests at tenant-based properties in which AMHA has an interest and a voucher holder is residing.

AMHA will follow the rent reasonableness and quality control processes used for all other properties.

Reason: New waiver for 2023 to achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting rent reasonableness tests.

39. Pg. MTW-11, Streamlining Waivers, after Allow Participants to Remain on the HCV Program for 12 Months

Add: Standardized Medical Deduction

Submitted: 10/4/22, Expected Approval: 1/1/23, Pending Approval

Waives certain provisions of sections 3(a)(1), 3(b)(4)-(5), and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.611 and 982.516.

The standardized medical deduction replaces the existing deduction for unreimbursed medical expenses. Any qualifying household (a household where the head, co-head, or spouse is disabled or age 62 or older) that claims unreimbursed medical expenses will receive the standard deduction of \$500. If the household believes their expenses are greater than \$500, they may submit proof of expenses and receive a hardship. The hardship will provide a deduction equal to the total annual unreimbursed medical expenses for the qualifying household. The standardized medical deduction and any hardships will continue to be reduced by the medical/disability threshold set by HUD (3% of total annual income).

Reason: New waiver for 2023 to achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, and lessen the burden on these elderly/disabled households.

40. Pg. MTW-11, Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

Previous: Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

New: Hardship Policy: Tiered Rent, Elimination of Deductions, and Work-Able Households Triennial Recertifications

Reason: To differentiate between triennial reexaminations for work-able households and elderly/disabled households.

41. Pg. MTW-12, Hardship Policy: Tiered Rent, Elimination of Deductions, and Triennial Recertifications

Previous: To request a tiered rent hardship exemption, the household must complete the Tiered Rent Hardship Request form.

New: To request a tiered rent hardship exemption, the household must complete the Hardship Request form.

Reason: The hardship request form will be used for multiple hardship reasons.

42. Pg. MTW-13, Hardship Policy

Move to pg. MTW-11 after first paragraph under Hardship Policy: If a household disagrees with their hardship determination, they may use the following grievance procedure:

Request a review, which will be conducted by a staff member at the supervisor level or higher. The household must request a grievance review within and including ten (10) business days of the decision to deny or limit their tiered rent hardship request.

Reason: Grievance procedure applies to all hardship types.

43. Pg. MTW-13, Hardship Policy, end of section

Add: Hardship Policy: Elderly/Disabled Households Triennial Recertifications

Households experiencing a decrease in income may request an interim reexamination. If a household believes they have another circumstance that qualifies as a financial hardship, the household must complete the Hardship Request form and attach proof of the hardship. The request will be reviewed and the household notified of the approval or denial in a timely manner. The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Hardship Policy: Standardized Medical Deduction

Households with unreimbursed medical expenses greater than \$500 may apply for a hardship. If approved, the hardship will provide a deduction equal to the household's total annual unreimbursed medical expenses (minus HUD's medical/disability threshold).

Hardships may be requested by the household or they may be automatic at the time of annual or triennial recertification.

To request a hardship, the household must complete the Hardship Request form and attach proof of all unreimbursed medical expenses for the prior 12 months. The form will be made available in an accessible format upon request as a reasonable accommodation. The request will be reviewed and the household notified of the approval or denial in a timely manner.

The hardship request will be denied if the form is not accompanied by documentation of the hardship and/or the request would not change the household's rent. In the case of hardship denials, the household will be sent a denial letter stating why they did not qualify.

Standardized Medical Deduction hardships will last until the household's next annual or triennial reexamination.

If a household is approved for a hardship, and subsequently incurs additional unreimbursed medical expenses while still in hardship status, they may request an additional hardship. The request will be treated as a new hardship request and undergo a new determination with proof of all applicable medical expenses. There is no limit on the number of hardships that a household may receive.

Reason: Add hardships for new 2023 waivers.