2021 Admin Plan Suggested Changes

1. Pg. i, Table of Contents
   Change: Order should be Program Integrity Addendum, Glossary, then Chapter 1, 2, etc.
   Reason: To match order of Admin Plan.

2. GL-9, after Private Space
   Add: PROJECT. In terms of Project Based Vouchers, a project may be a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land.
   Reason: PIH Notice 2017-21 states that PHAs must define “project” in their Administrative Plan.

3. Pg. 2-8, Other Criteria for Admissions, after last bullet point
   Add: • Persons currently listed on the AMHA Criminal Trespass List.
   Reason: Consistency, to mirror LIPH policy.

4. Pg. 3-5, Information Required, #3
   Change:
   Previous: Current government issued photo identification or other photo identification of comparable reliability such as a school or business photo ID
   New: Current or recent government issued photo identification or other photo identification of comparable reliability such as a school or business photo ID
   Reason: Recently expired forms of identification are also acceptable.

5. Pg. 4-3, Local Preferences, Summit County Children Services (SCCS) Certified Emancipated Youth and FUP Youth and Families, before parentheses
   Add: Due to the limited number of available preferences, an applicant that qualifies for this preference cannot simultaneously qualify for the Full Term First Birthday preference.
   Reason: Clarifying which preferences may be received by an applicant at one time.

6. Pg. 4-3, Local Preferences, insert after #4 and renumber preferences listed after
   Add: 5. Full Term First Birthday Preference: for applicants referred by the Full Term First Birthday Greater Akron program, which works to promote healthy full-term pregnancies and ensure every child celebrates a first birthday. Due to the limited number of available preferences, an applicant that qualifies for this preference cannot simultaneously qualify for the Emancipated Youth and FUP preference. (This preference will be capped at 20 participants across all programs).
   Reason: To address the social stressor of housing needs for families working towards healthy full-term pregnancies and a child who celebrates their first birthday.

7. Pg. 4-3, Local Preferences, Transitional/Homeless Non-Elderly Disabled Preference
   Change:
   Previous: for families that are composed of one of more non-elderly persons aged 18 to 61 with disabilities who are transitioning out of an institutional or other segregated setting, at serious risk of institutionalization, homeless, or at risk of becoming homeless and are eligible for services through a partner agency with whom AMHA has executed a Memorandum of Understanding (MOU).
   New: for families that are composed of one of more non-elderly persons aged 18 to 61 with disabilities who are eligible for services through a partner agency with whom AMHA has executed a Memorandum of Understanding (MOU) and are:
• transitioning out of an institutional or other segregated setting,
• at serious risk of institutionalization,
• homeless,
• at risk of becoming homeless, or
• previously experienced homelessness and are currently a client in a permanent supportive housing or rapid rehousing project.

Reason: To assist Mainstream eligible residents of permanent supportive housing or rapid rehousing projects in “moving on.”

8. Pg. 4-3, Local Preferences, currently #6
Change:
Previous: Moving On Preference: for current Shelter Plus Care and FUP participants who have volunteered and meet the eligibility requirements to obtain a tenant based housing choice voucher.

New: Moving On Preference: for current supportive housing program participants (Shelter Plus Care, Family Unification Program, and Continuum of Care Permanent Supportive Housing with whom AMHA has executed an MOU) who have volunteered and meet the eligibility requirements to obtain a tenant based housing choice voucher. This preference is available when the supportive housing program is fully utilized per the grant agreement or is otherwise approved by the Housing Placement Manager or their designee. (Use of this preference for Continuum of Care participants will be capped at 20 participants across all programs).

Reason: To include participants moving on from other CoC funded permanent supportive housing.

9. Pg. 4-7, Order of Selection, insert after Emancipated Youth
Add: Full Term First Birthday Preference (Capped at 20 participants) 2 points

Reason: To address the social stressor of housing needs for families working towards healthy full-term pregnancies and a child who celebrates their first birthday.

10. Pg. 7-15, Verification of Waiting List Preferences, after Emancipated Youth
Add: Full Term First Birthday Preference: for applicants referred by the Full Term First Birthday Greater Akron program, which works to promote healthy full-term pregnancies and ensure every child celebrates a first birthday.

Certification of eligibility from Full Term First Birthday or one of its partners will be required.

Reason: To address the social stressor of housing needs for families working towards healthy full-term pregnancies and a child who celebrates their first birthday.

11. Pg. 7-15, Verification of Waiting List Preferences, Moving On Preference
Change:
Previous: This preference is for current SPC or FUP voucher holders who no longer require case management per supportive service provider, have demonstrated the ability to live stably and maintain housing, and wish to receive a tenant based voucher.

Referral from supportive service provider will be required.

New: This preference is for current participants in a supportive service housing program (SPC, FUP, CoC-PSH with whom AMHA has executed an MOU) who no longer require case management per the supportive service provider, have demonstrated the ability to live stably and
maintain housing, and wish to receive a tenant based voucher. This preference is available when the supportive housing program is fully utilized per the grant agreement or is otherwise approved by the Housing Placement Manager or their designee. Referral from supportive service provider will be required.

Reason: To include participants moving on from other CoC funded permanent supportive housing.

12. Pg. 7-15, Verification of Waiting List Preferences

Change:

Previous: Transitional/Homeless Non-Elderly Disabled Preference: for families that are composed of one or more non-elderly persons aged 18 to 61 with disabilities who are transitioning out of an institutional or other segregated setting, at serious risk of institutionalization, homeless, or at risk of becoming homeless and are eligible for services through a partner agency with whom AMHA has executed a Memorandum of Understanding (MOU).

New: Transitional/Homeless Non-Elderly Disabled Preference: for families that are composed of one or more non-elderly persons aged 18 to 61 with disabilities who are eligible for services through a partner agency with whom AMHA has executed a Memorandum of Understanding (MOU) and are:

- transitioning out of an institutional or other segregated setting,
- at serious risk of institutionalization,
- homeless,
- at risk of becoming homeless, or
- previously experienced homelessness and are currently a client in a permanent supportive housing or rapid rehousing project.

Reason: To assist Mainstream eligible residents of permanent supportive housing or rapid rehousing projects in “moving on.”

13. Pg. 8-2, Briefing Packet, 3rd bullet point

Change:

Previous: Information on Small Area FMRs if being used by the PHA.

New: Information on multiple payment standards if being used by the PHA.

Reason: Need to provide information on any options in payment standards – PHA determined payment standards and/or Small Area FMR payment standards.

14. Pg. 8-4, Expirations, 2nd paragraph

Change:

Previous: If the voucher has expired the family will be denied assistance. The family will not be entitled to a review or hearing. If the family is currently assisted, they may remain as a participant in their unit if there is an assisted lease/contract in effect.

New: If the voucher has expired, the family will be denied assistance and will be removed from the Housing Choice Voucher waiting list. The family will have to reapply to be considered for the Housing Choice Voucher Program. The family will not be entitled to a review or hearing. If the family is currently assisted, they may remain as a participant in their unit if there is an assisted lease/contract in effect.
Reason: The HCVP Guidebook chapter on Housing Search and Leasing states that the PHA’s policy on how to treat a family whose HCV term expires, including if they must reapply, must be stated in the Administrative Plan.

15. Pg. 8-5, Remaining Member of Tenant Family, after 1st sentence
   Add: In cases where the current head of household is voluntarily leaving the tenant family, the new head of household must have been part of the tenant family for at least the prior 12 months. An exception to this requirement due to extreme hardship may be approved by the HCVP Manager or their designee.
   Reason: To ensure that the positions of families on the wait list are honored by not allowing current families to give their voucher away to someone on the wait list.

16. Pg. 10-1, Introduction, 2nd paragraph
   Remove: The use of the term “UPCS-V” in this Administrative Plan refers to the combination of both HUD and PHA requirements. (See additions to UPCS-V). Please refer to the Inspection Handbook published separately for additional information.
   Reason: No longer have additional PHA standards.

17. Pg. 10-4, Life threatening repairs, 6th bullet point
   Add: detectors
   Reason: Word missing from end of sentence.

18. Pg. 11-4, Quality of Units Selected
   Change:
   Previous: The PHA will review the quality of units...
   New: The PHA may review the quality of units...
   Reason: This review is not required, but is optional at AMHA’s discretion.

19. Pg. 15-3, Grounds for Denial or Termination of Assistance, at end of bulleted list
   Add: • If any family member has been convicted of manufacturing or producing methamphetamine.
   Reason: 24 CFR 982.553 states that AMHA must prohibit admission if the PHA determines that it has reasonable cause to believe that a household member's illegal drug use or a pattern of illegal drug use may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

20. Pg. 15-5, Standard for Violation, new 1st paragraph
   Add: The PHA will deny participation in the program to applicants that are currently listed on the AMHA Criminal Trespass List.
   Reason: Consistency, to mirror LIPH policy.

21. Pg. 15-7, Notice of Termination of Assistance, 2nd paragraph
   Change:
   Previous: If the PHA proposes to terminate assistance for criminal activity as shown by a criminal record, the PHA will provide the subject of the record and the tenant with a copy of the criminal record.
New: If the PHA proposes to terminate assistance for criminal activity as shown by a criminal record, the PHA will, upon request, provide the subject of the record and the tenant with a copy of the criminal record.

Reason: To clarify when the criminal record will be supplied.

22. Pg. 15-12, Proposed Additions to the Family, add after 4th bullet point
Add: • Persons who have been convicted of manufacturing or producing methamphetamine.
Reason: 24 CFR 982.553 states that AMHA must prohibit admission if the PHA determines that it has reasonable cause to believe that a household member's illegal drug use or a pattern of illegal drug use may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

23. Pg. 15-15, Moving On Strategy
Change:
Previous: Many participants, over time, may find that they no longer need the level of supportive services that are provided while in the Shelter Plus Care (SPC) program or Family Unification Program (FUP). When people have the opportunity to move from supportive housing into another stable housing opportunity, such turnover creates availability in existing supporting housing vouchers that can be used to serve other eligible households. In such cases where current SPC and FUP vouchers are fully utilized per the grant agreements, eligible SPC and FUP participants who wish to obtain a tenant based voucher may receive a Moving On preference, see Chapters 4 and 7. Once the participant has moved on to a tenant based voucher, this frees up the SPC or FUP voucher for another eligible family.

New: Many participants, over time, may find that they no longer need the level of supportive services that are provided while in the Shelter Plus Care (SPC) program, Family Unification Program (FUP), or Continuum of Care Permanent Supportive Housing (CoC-PSH) program (a program with an active Memorandum of Understanding between AMHA and the CoC-PSH program). When people have the opportunity to move from supportive housing into another stable housing opportunity, such turnover creates availability in existing supportive housing vouchers that can be used to serve other eligible households.

In such cases where the supportive service housing programs are fully utilized per the grant agreements or are otherwise approved by the Housing Placement Manager or their designee, eligible SPC, FUP, and CoC-PSH participants who wish to obtain a tenant based voucher may receive a Moving On preference, see Chapters 4 and 7. For FUP families only (excluding FUP youth), they may be transferred to the regular HCV program when there are no longer children in the household (e.g., children turn 18 or are permanently removed from the home) and do not have to reapply to the HCV waitlist. Once the participant has moved on to a tenant based voucher, this frees up the SPC, FUP, or CoC-PSH housing for another eligible family.

Reason: To include participants moving on from other CoC funded permanent supportive housing.

24. Pg. 18-1, Introduction, make a new paragraph after 1st paragraph
Add: Informal reviews and hearings may, at the discretion of the PHA, be held in person or may be conducted remotely. All parties will be notified of the method to be used in advance of the scheduled review/hearing.

Reason: To clarify that reviews and hearings may be conducted in alternate formats as needed by the PHA.

25. Pg. 18-1, Complaints to the PHA, 3rd paragraph
Change:
Previous: All complaints will be referred to the related HCVP Supervisor and then to the Director of Operations or to investigations, if necessary.
New: Complaints may be referred to the related HCVP Supervisor, HCVP Manager or to investigations, if necessary.
Reason: To clarify how complaints are handled and to match current practice.

26. Pg. 18-2, Informal Review Procedures for Applicants, 3rd paragraph
Change:
Previous: When denying admission for criminal activity as shown by a criminal record, the PHA will provide the subject of the record and the applicant with a copy of the criminal record upon which the decision to deny was based.
New: When denying admission for criminal activity as shown by a criminal record, the PHA will, upon request, provide the subject of the record and the applicant with a copy of the criminal record upon which the decision to deny was based.
Reason: To clarify when the criminal record will be supplied.

27. Pg. 19-1, Introduction
Change:
Previous: A family may choose whether to rent housing that qualifies as a special housing type or to rent other eligible housing in accordance with requirements of the program.
New: Families may choose to utilize the following special housing types: shared housing and manufactured homes where the family leases both the manufactured home and the space. The PHA will not provide assistance for other special housing types unless approved through a reasonable accommodation. The PHA has suspended the homeownership voucher option effective January 1, 2016. Homeownership assistance payments will continue to be provided to qualified families with executed homeownership vouchers prior to January 1, 2016.
Reason: To clarify which special housing types can be used with a voucher.

28. Pg. 19-15, Continued Assistance, last bullet point
Remove: The home must pass a HUD Housing Quality Standards/Uniform Physical Condition Standards for Vouchers inspection at least biennially.
Reason: To match current practice, inspections are not required by HUD for homeownership vouchers.

29. Pg. 20-2, Selection Criteria, end of the bulleted list
Add: Proposals that include additional units to a proposed or current PBV project may be approved if the addition supports AMHA’s PBV commitments and priorities as listed in this chapter. Additional PBV contract units are subject to all PBV requirements, except that a new PBV proposal competition is not required. The units may be added at any time during the term of the HAP contract. The anniversary and expiration dates of the HAP contract for the additional
units must be the same as the anniversary and expiration dates of the HAP contract term for the PBV units originally placed under HAP contract.

Reason: PIH 2017-21 states that when a PHA intends to add PBV units to a current HAP contract, it must be stated along with the rationale in the Administrative Plan.

30. Pg. 20-5, Supportive Services Guidelines and Requirements

Change:

Previous:

E. SUPPORTIVE SERVICES GUIDELINES AND REQUIREMENTS

- Educational Services or Counseling
- Employment or vocational training, counseling or referrals
- Life skills training or counseling
- Credit counseling
- Personal Finance training and counseling
- Healthcare prevention and/or Community Outreach
- Supportive housing for persons with developmental disabilities or mental illness
- Supportive housing for persons with legal custody of grandchildren
- Referrals to or provision of day care, after school programs or other youth services

Pursuant to HUD regulations, project-based assistance will ordinarily be limited to 25% of the units contained within the proposed project. However, for projects providing supportive services, each unit that is occupied by families receiving qualified supportive services shall be an “excepted unit” and shall not apply towards the 25% cap.

Qualifying Supportive Services

Qualifying Supportive Services include:

- Job training
- Counseling
- Case management services with extended day hours availability and on-call availability
- Coordination with vocational services, including coordination with job training and employment services

It is not necessary that the above services be provided by or at the project. However, to qualify for as an “excepted unit” a family must have at least one member receiving at least one qualifying supportive service. Proposals that include supportive services should identify the particular services that will be provided and the service provider(s). AMHA will evaluate proposals including supportive housing units on the basis of the specific services provided, the intensity of the services and the target population to be served. AMHA will also evaluate supportive housing proposals based on the history and track record of the proposed service providers and the need for the supportive housing at the proposed site.

Family Responsibility

At the time of the initial lease execution between the family and the owner, the family and AMHA must sign a Statement of Family Responsibility. The Statement of Family Responsibility must contain all family obligations including the family’s participation in a service program as contemplated within this Administrative Plan. A form Statement of Family Responsibility is attached to this chapter.
At the family’s annual income reexamination, AMHA will require written documentation from the service provider indicating the family’s continued compliance with the terms of the supportive services plans. Project owners will also be expected to provide some level of monitoring of the services provided. This monitoring should be detailed in the proposal, and will be evaluated as part of the section process. At AMHA’s discretion, AMHA may request additional documentation of compliance with supportive service obligations.

The unit is eligible for status as an “excepted unit” so long as at the time of the occupying family’s initial tenancy at least one member of the family is receiving a qualifying supportive service. If the family completes an FSS contract of participation or the supportive services requirement, the unit will continue to count as an “excepted unit” for as long as the family resides in that unit.

New:

E. SUPPORTIVE SERVICES GUIDELINES, EXCEPTED UNITS AND REQUIREMENTS

- Educational Services or Counseling
- Employment or vocational training, counseling or referrals
- Life skills training or counseling
- Credit counseling
- Personal Finance training and counseling
- Healthcare prevention and/or Community Outreach
- Supportive housing for persons with developmental disabilities or mental illness
- Supportive housing for persons with legal custody of grandchildren
- Referrals to or provision of day care, after school programs or other youth services

Pursuant to HUD regulations, project-based assistance will ordinarily be limited to the greater of 25 units or 25% of the units contained within the proposed project. Units that are in a census tract with a poverty rate of 20 percent or less are subject to a higher cap: the greater of 25 units or 40% of the project units.

“Excepted units” shall not apply towards the project cap. “Excepted units” include:

- Units exclusively serving elderly families. The entire project is not required to exclusively serve elderly families.
- However, for projects providing supportive services, each unit that is occupied by a household eligible for one or more supportive services available to all families receiving PBV assistance in the project, families receiving qualified supportive services shall be an “excepted unit” and shall not apply towards the project 25% cap.

Qualifying Supportive Services

Qualifying Supportive Services include:

- Job training
- Coordination with vocational services, including coordination with job training and employment services
- Educational Services or Counseling
- Employment or vocational training, counseling or referrals
- Life skills training or counseling
- Credit counseling
- Personal Finance training and counseling
• Healthcare prevention and/or Community Outreach
• Supportive housing for persons with developmental disabilities or mental illness
• Supportive housing for persons with legal custody of grandchildren
• Referrals to or provision of day care, after school programs or other youth services
• Counseling
• Case management services with extended day hours availability and on-call availability

It is not necessary that the above services be provided by or at the project, but the services must be reasonably available to the families receiving PBV assistance in the project and designed to help the families in the project achieve self-sufficiency or live in the community as independently as possible. However, to qualify for as an “excepted unit,” a family must have at least one member receiving eligible for at least one qualifying supportive service. Proposals that include supportive services should identify the particular services that will be provided and the service provider(s). AMHA will evaluate proposals including supportive housing units, on the basis of the specific services provided, the intensity of the services and the target population to be served. AMHA will also evaluate supportive housing proposals based on the history and track record of the proposed service providers and the need for the supportive housing at the proposed site.

In order for the supportive services exception to apply to a unit, the project must make supportive services available to all assisted families in the project and the family must have at least one member eligible for one or more of the services. The family may, but is not required to, participate in the services. A PHA may not require participation in supportive services as a condition of living in an excepted unit, which means that a PHA may not rely solely on a supportive services program that would require the family to engage in the services once enrolled, such as the Family Self-Sufficiency (FSS) program, for the unit to qualify for the supportive services exception.

Family Responsibility
At the time of the initial lease execution between the family and the owner, the family and AMHA must sign a Statement of Family Responsibility. The Statement of Family Responsibility must contain all family obligations including the family’s participation in a service program as contemplated within this Administrative Plan. A form Statement of Family Responsibility is attached to this chapter.

At the family’s annual income reexamination, AMHA will require written documentation from the service provider indicating the family’s continued compliance with the terms of the supportive services plans. Project owners will also be expected to provide some level of monitoring of the services provided. This monitoring should be detailed in the proposal, and will be evaluated as part of the section process. At AMHA’s discretion, AMHA may request additional documentation of compliance with supportive service obligations.

The unit is eligible for status as an “excepted unit” so long as at the time of the occupying family’s initial tenancy at least one member of the family is receiving a qualifying supportive service. If the family completes an FSS contract of participation or the supportive services requirement, the unit will continue to count as an “excepted unit” for as long as the family resides in that unit.

Excepted Unit Status
For supportive services “excepted units,” the unit is eligible for status as an “excepted unit” so long as at the time of the occupying family’s initial tenancy at least one member of the family is receiving eligible for a qualifying supportive service. In the case of a family that chooses to participate in the supportive services and successfully completes the supportive services objective, the unit will continue to be an excepted unit under this category for as long as the family resides in the unit.
FSS contract of participation or the supportive services requirement, the unit will continue to count as an “excepted unit” for as long as the family resides in that unit.

In the case of an “excepted unit” that exclusively serves elderly families, the PHA may allow a family that initially qualified for occupancy of an excepted unit based on elderly family status to continue to reside in a unit, where through circumstances beyond the control of the family (e.g., death of the elderly family member or long term or permanent hospitalization or nursing care), the elderly family member no longer resides in the unit. In this case, the unit may continue to count as an excepted unit for as long as the family resides in that unit. Once the family vacates the unit, in order to continue as an excepted unit under the HAP contract, the unit must be made available to and occupied by a qualifying family.

Owners under HAP contracts in effect prior to April 18, 2017, remain obligated by the terms of those HAP contracts with respect to the requirements that apply to the number and type of excepted units in a project. That is, the owner must continue to designate the same number of contract units and assist the same number and type of excepted units as provided under the HAP contract during the remaining term of the HAP contract, unless the owner and the PHA mutually agree to change those requirements.

*Relevant Regulation:* PIH Notice 2017-21, 24 CFR 983.56, 24 CFR 983.262

**Reason:** PIH 2017-21 altered the project cap for a PBV project to 25 units or 25% of the units in a project, whichever is greater. It also removed the requirement for participation in supportive services as a condition of living in an excepted unit and instead requires services to be available to eligible households. We are choosing to add units exclusively serving elderly families as an additional exception to the PBV project cap.

31. Pg. 20-8, Preferences, Summit County Children Services (SCCS) Certified Emancipated Youth and FUP Youth and Families, before parentheses
   Add: Due to the limited number of available preferences, an applicant that qualifies for this preference cannot simultaneously qualify for the Full Term First Birthday preference.
   **Reason:** Clarifying which preferences may be received by an applicant at one time.

32. Pg. 20-8, Local Preference System, after Emancipated Youth
   Add: Full Term First Birthday Preference: for applicants referred by the Full Term First Birthday Greater Akron program, which works to promote healthy full-term pregnancies and ensure every child celebrates a first birthday. Due to the limited number of available preferences, an applicant that qualifies for this preference cannot simultaneously qualify for the Emancipated Youth and FUP preference. (This preference will be capped at 20 participants across all programs).
   **Reason:** To address the social stressor of housing needs for families working towards healthy full-term pregnancies and a child who celebrates their first birthday.

33. Pg. 20-8, Local Preference System, after Emancipated Youth and new Full Term First Birthday Preference
   Add: Transitional/Homeless Non-Elderly Disabled Preference: for families that are composed of one of more non-elderly persons aged 18 to 61 with disabilities who are eligible for services through a partner agency with whom AMHA has executed a Memorandum of Understanding (MOU) and are:
   - transitioning out of an institutional or other segregated setting,
   - at serious risk of institutionalization,
   - homeless,
   - at risk of becoming homeless, or
• previously experienced homelessness and are currently a client in a permanent supportive housing or rapid rehousing project.

Reason: To assist Mainstream eligible residents of permanent supportive housing or rapid rehousing projects in “moving on.”

34. Pg. 20-11, Preference Chart, after Emancipated Youth
   Add: Full Term First Birthday Preference  2 points
   Reason: To address the social stressor of housing needs for families working towards healthy full-term pregnancies and a child who celebrates their first birthday.

35. Pg. 20-13, Family’s Right to Move, at end of section
   Add: At the PHA’s discretion, the PBV HAP contract may provide for vacancy payments to the owner as defined under 24 CFR 983.352.
   Reason: PIH Notice 2017-21 requires PHAs to state in the administrative plan if vacancy payments may be granted for PBV projects.