

Attachment C

Summary of 2016 Administrative Plan Changes

- Refined the definition of a reasonable accommodation - it is an adjustment made to a rule, policy, practice, or service that allows a person with a disability to have equal access to the HCV program.
- Clarified that for families requiring a higher payment standard, HACCC can make reasonable accommodations to the FMR for a disabled person/family up to 120 % of the Fair Market Rent.
- Revised Wait List process to reflect that the wait list will open every 24 months and purged after 24 months so that a new wait list can be created.
- Clarified that for families requiring a higher utility allowance, HACCC can make a reasonable accommodation to the Utility Allowance for a disabled person/family to use the actual size of the family's unit rather than the family's voucher size.
- Removed the reference to "common law" marriage as an example of a marriage partner.
- Clarified language about when a child under 6 years of age must document and disclose their SSN - within 90 days of the effective date of the initial HAP contract.
- Removed the reference to "arrests" as a reason for denying an applicant assistance. Language refers only to convictions but can use arrests to investigate whether applicant or participant engage in criminal activity.
- Modified the language regarding the admission preference of formerly homeless families working with designated homeless providers throughout the County of Contra Costa to permit up to 50 households to be assisted as a set aside.
- Added language to clarify how a Residency Preference on the waiting list can be verified
- Revised the language to reflect HUD's new policy on the Earned Income Disregard (EID). Now permits that 100 % of earned income be disregarded for first 12 months and 50 % of earned income be disregarded for second 12 months. New regulations limit the lifetime use of EID to a 24 month period.
- Revised language to state that college tuition and fees are defined in the same manner in which the Department of Education defines tuition and fees.
- Clarified that staff must only make copies of original documents when completing a family's certification. If the original document is not available, then staff can use secondary verification to authenticate a copy.
- For families with fixed income sources, inserted language that HACCC shall be using the cost of living adjustment or current rate of interest to the previously verified or adjusted income amount to determine the new amount. Fixed income sources include SSA, SSI,

SDI, Federal, state, local, or private pension plans; annuities or other retirement benefit programs, insurance policies, disability or death benefits, or other similar types of periodic receipts; or any other source of income subject to adjustment by a verifiable COLA or current rate of interest. However, every 3 years, 3rd party verification is required.

- Assets under \$5000 can be self-certified by the family. However every third year , third party verifications are required.
- Added clarifying language that HACCC shall not charge owners for HQS inspections and will not use alternative inspection standards.
- Revised language regarding when rent reasonableness is required to state: whenever there is a 10% reduction in the published FMR in effect 60 days before the contract anniversary. This is an increase from the previous amount of 5 %.
- Added language to the plan regarding the regulations governing Enhanced Vouchers which permit the payment standard for a unit in a property where the owner is opting out of the HUD Multi-Family Subsidy Program to be the new increased rent the owner has requested of the family. This permits the family to remain housed in their existing unit without any financial hardship.
- Clarified that when the FMR changes, it will be effective 60 days after the effective date of the new HUD FMR publication by HUD. For FMRs that results in Payment Standards that are outside the HUD permitted range, adjustments will be made to the payment standard within 60 days of the FMR effective date for all New Contracts. For all other transactions, the pre-adjusted higher Payment Standard will remain in place as long as the family continues to live in the same unit.
- Clarified the language regarding utility allowance schedules: Single Family Dwellings - no shared walls; Duplex/Townhouse/Row House - one or more shared walls; Apartments - 3 or more units in a building; and Manufactured Homes.