

Attachment C

Summary of 2018 Administrative Plan Changes

- Added Chapter 18 - PBV Under the Rental Assistance Demonstration (RAD) Program to the table of contents.
- Deleted Housing Rights, Inc as a local agency where you can file housing discrimination complaints. All complaints should be filed with HUD's Office of Fair Housing and Equal Opportunity.
- Added the Mainstream Program for Non-Elderly Disabled Households as a Special Purpose Funding source. This permits participants of the program to bypass the Housing Choice Voucher (HCV) waiting list.
- Added a preference for participants of the Mainstream Program to the list of HCV waiting list preferences. Permits 250 points be awarded to participants so that they can rise to the top and be assisted immediately.
- Deleted a section where the preferences were repeated within the same chapter of the Administrative Plan.
- Added a time frame within which lead based paint hazards must be corrected when there is a child under six living in the household. Owners will have 30 days to make corrections.
- Defined the period when a triennial income certification is permitted and clarified when non-fixed incomes will be verified. If at least 90% of the household income is from a fixed source, then can certify the income every three years and all non-fixed income will be verified every 3rd year. If at least one source of income is fixed but accounts for less than 90 % of the household's income, HACCC shall verify non-fixed income annually.
- Modified the homeownership section of the Administrative Plan to bring it to conformity with the Nan McKay template. Modifications were made as follows:
 1. Clarified that only participants in good standing could enroll in the homeownership program and provided clarification of how good standing is defined.
 2. Changed the eligibility for homeownership to require that the head of household rather than one or more adult family members must be employed for one year prior to the start of homeownership participation.
 3. Clarified when a homeownership participant will be required to undergo post-purchase housing counseling. Mainly when violating obligations or failing to perform to program expectations.
 4. Specified that a Housing Quality Standards inspection must be conducted and passed prior to closing on a sale.
 5. Added a requirement that the family be required to provide at least 1% of the down payment from their own savings or escrow account.
 6. Specified the requirements for continued assistance under the homeownership program.

7. Specified that the family must execute a Statement of Homeownership Participation prior to participation in homeownership.
 8. Added a requirement for continued employment, subject to mitigation, while participating in the homeownership program.
 9. Added language regarding the prohibition on sale or conveyance of the property.
 10. Clarified several Family obligations that are further specified in the Statement of Homeownership Participation.
 11. Removed duplicate language from the existing Administrative Plan.
 12. Added language regarding the family's right to an informal hearing if they are being terminated from the HCV Homeownership Program
 13. Added language regarding recapture of the homeownership assistance paid on behalf of the family in the event of fraud or misrepresentation of material facts.
- Payment Standard changes will be effective on January 1st of every year or within 90 days/3 months of the HUD published Fair Market Rent effective date, whichever is earlier.
 - Added language regarding the appeal process for informal hearing decisions and established a line of appeal to the Executive Director or their designee when appealing a hearing decision.
 - Revised language regarding owner notification of HUD about reports of children with elevated blood levels (EBL) to HUD. Within 5 days of receiving a report of a child with EBL, the owner must notify HUD within 5 business days. The same requirement shall apply to HACCC when notified by an owner that a child has been reported as having an EBL in their unit.
 - Revised Project Based Voucher (PBV) language regarding PBV Program set asides. In addition to 20 % of Voucher units, an additional 10% can be set aside for PBV assistance if the units are dedicated to homeless as defined by Section 103 of the McKinney -Vento Homeless Assistance Act, veterans of the U.S. Armed Forces and/or projects that provide supportive housing to elderly or disabled households as defined in 24CFR 5.403 or are located in a census tract with a poverty rate of 20 percent or less.
 - New language is being added to specify which units do not count against HACCC's 20% threshold for PBV assistance. These include RAD, VASH PBV Set-Aside funding and units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after 4/18/17.
 - Clarifying that HACCC may select a public housing project in which HACCC has an ownership interest or control and will spend a minimum amount per unit in rehabilitation or construction improvements through a non-competitive selection process for awarding PBV assistance to the project.
 - Modified the cap on the number of PBVs in a project from the greater of 25% or 25 units to the greater of 25 units or 40% of the units in the project when the property is located in a census tract with a poverty rate of less than 20 %.
 - Clarified that PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV

assistance. This was achieved by striking several citations from this section of the Administrative Plan.

- Clarified that HACCC shall not provide assistance to a family until the unit has passed Housing Quality Standards inspections.
- HACCC will no longer permit applicants who are not 62 years of age or older to be placed on site-based PBV waiting lists targeted to units restricted to elderly households. As a matter of fairness, for previously established PBV waiting lists with non-elderly applicants, if at the time they reach the top of a senior waiting list, they are 55 years of age or older and have applications for other senior developments in the PBV portfolio, they will be removed from the list they reached the top of only. The other waiting list applications will remain active until they reach the top of those waiting lists. At that time, if they are still not 62 years of age or older, they will be removed from that particular waiting list at that time.
- Revised the list of properties participating in the PBV program to include all RAD PBV-assisted properties.
- Revised the list of PBV units that are restricted to homeless households who must be referred from the Coordinated Entry System of Contra Costa County. Added 5 units at Robin Lane Apartments in Concord.
- Added language regarding when a family is eligible to move with continued assistance from a project-based voucher assisted unit. Family must have been in the unit for 12 consecutive months and be in good standing as defined in the Administrative Plan.
- Added a new Chapter 18 - Project-Based Voucher (PBV) Under the Rental Assistance Demonstration (RAD) Program to the Administrative Plan. Areas covered are as follows:

Part I: General Requirements. This part describes general provisions of the PBV program, including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Project Selection. This part describes the cap on assistance at projects receiving PBV assistance, ownership and control, and site selection standards.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution and term of the HAP contract.

Part V: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VI: Occupancy. This part discusses occupancy requirements related to the lease, and describes under what conditions families are allowed or required to move.

Part VII: Determining Contract Rent. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract.

Part VIII: Payments to Owner. This part describes the types of payments owners may receive under this program.