



PROPOSED 2025 SIGNIFICANT CHANGES

The Public Housing Authority (PHA) must define any significant changes to its policies or plans. The PHA defines a “substantial deviation” and “significant amendment/modification” as any change in policy which significantly and substantially alters the Authority’s mission and the persons the Authority serves. The proposed changes below have not been deemed “significant”.

New language is indicated in red. Deleted language is shown as ~~strikeout~~.

ADMISSIONS AND CONTINUED OCCUPANCY POLICY (ACOP)

1. Chapter 2 – Eligibility For Admission, page 2-2 and 2-3

Admission of applicants with any current **warrants** ~~criminal charges~~ will be delayed pending **clearance of the warrant** ~~final disposition of the charges (e.g. dismissal or conviction)~~. After ~~final disposition of the case~~ the applicant will be reviewed to ~~determine whether they meet all admission criteria~~. **After clearance of the warrant, the applicant will be reviewed to determine if they meet the admission criteria.**

~~Where fingerprinting is not an option,~~ The PHA will ask the prospect to list all convictions that have occurred in the past three (3) years. If the prospect neglects to list a past conviction, the PHA may elect to continue to process the prospect. ~~If a prospect is able to be fingerprinted, the PHA will not ask the prospect to list any convictions~~

Explanation of Change: Updating to be compliant with Fair Housing Regulations

2. Chapter 8 – Transfer Policy, Page 8-2 and 8-3

Emergency Transfers and Temporary Relocation

The PHA will authorize an emergency transfer **or temporary relocation** for a participant family if the resident's unit has been damaged by fire, flood, or other causes to such a degree that the damages are hazardous to life, health or safety and the unit is not habitable. **The PHA must approve in writing any temporary relocation unit (and any subsequent unit the family chooses to move to) prior to the family moving into the temporary unit. The PHA shall determine, in its sole and absolute discretion, whether to approve a temporary relocation unit that is owned, rented, or occupied by friends or family of the participant family.**

In the event that **the PHA has** one unit that is appropriate in size and/or accessibility available, the family will be required to move **into that unit. The family will be required to enter into a lease amendment for that unit, even if it is on a temporary basis. The PHA may terminate the resident’s lease if he or she refuses to move or enter into a lease**

amendment for the new unit. The resident shall be given thirty (30) days' Notice of Lease Termination in this situation.

During the family's temporary relocation, the family shall have the option of:

- (i) continuing to pay their monthly rent for the unit they were temporarily relocated from and have the PHA pay for the increase in rental costs of the temporary unit, or;
- (ii) discontinuing to pay their monthly rent and have the PHA reimburse the family for the full cost of the temporary unit less the monthly rent amount of the unit the family was temporarily relocated from. The family must provide the PHA with the original receipt for payment of the full cost of the temporary unit.

The PHA shall reimburse the family for approved moving costs to the temporary unit. In accordance with the Tenant Assistance, Relocation and Real Property Acquisition Handbook (1378.0), the family shall be required to submit their moving cost estimates to the PHA for approval prior to the move. Failure by the family to receive approval of moving cost estimates by the PHA ahead of time may result in the resident not being fully reimbursed. The PHA shall determine the possessions to be moved and the moving costs are reasonable and necessary. Additionally, the PHA shall, in its discretion, either return the family to the same unit it was temporarily relocated from or provide a comparable replacement dwelling (as defined in 49 CFR 24.2(a)(6)(ix)) prior to the one-year anniversary of the date of the lease amendment for the family's temporary relocation.

The PHA **will** review mitigating circumstances and reasonable accommodations and may approve a second offer. If the household refuses to move after review of circumstances and/ or reasonable accommodation requests the household ~~will~~ may be subject to termination of tenancy.

~~Damages caused by negligence of the resident, their household members, or guests, which are beyond normal wear and tear will be charged to repair such damage, along with all moving expenses. In addition, the household may also be subject to eviction from public housing.~~

If the damage was caused by negligence of the resident, a member of the resident's household, or a guest, the reasonable expense of repairing such damage will be charged to the resident, along with all moving expenses, and the household may be subject to eviction from public housing.

The resident will continue to pay their utility bill and be reimbursed for any amounts over their baseline usage. In the event the increased cost of utilities creates a financial burden on the resident the PHA will pay the difference of the baseline usage minus the utility allowance directly to the Utility Company.

Explanation of Change: Clarification on Temporary Relocation

3. Chapter 9- Leasing Page 9-16

The PHA may enter a Resident's dwelling units to perform inspections and/or repairs as follows:

(1) The PHA will give Resident forty-eight (48) hours written notice stating the purpose of entry to the dwelling unit. The PHA's entry shall be in a four (4) hour range of normal business hours **when it is possible to do so e.g. The PHA will not be able to accommodate for federal inspections and 3rd party inspections.**

(2) The PHA may enter the premises at any time without advance notification when there is reasonable cause to believe that an emergency exists.

Explanation of Change: Clarification on 4 hour range due to uncontrollable federal or 3rd party inspections

4. Chapter 13 – Complaints, Grievances, and Appeals 13-6 through 13-9

NOTIFICATION OF HEARING

~~When~~ **After** the PHA receives a request for a formal hearing, a hearing shall be held **scheduled promptly** ~~within thirty (30) days from the receipt of the request for formal hearing.~~ The Family will receive a notice at least (ten) 10 business days before the hearing date which will be deemed delivered immediately to the Family one (1) day after the PHA deposits the notice in the U.S. mail or immediately upon transmission to the Family by email. The hearing notice will contain:

- The date and time of the hearing,
- The location where the hearing will be held,
- ~~▪ Information about the family's right to bring evidence, witnesses, legal or other representation at the family's expense. If the family brings legal representation, they must notify the PHA no later than five (5) business days prior to the scheduled hearing date. If the family does not provide such notice the PHA may postpone the hearing to secure counsel. Lack of notice to the PHA of the presence of counsel representing the family may cause the PHA to reschedule the hearing to allow the PHA's counsel to be present.), and~~
- ~~▪ The right to view any documents or evidence in the possession of the PHA upon which the PHA based the proposed action and, at the family's expense, to obtain a copy of such documents prior to the hearing. (Late requests for documents or evidence may result in postponement of the hearing. In this case, the resident and the PHA may agree to reschedule the hearing to a mutually agreed upon date and time. The family may review all documents relevant to the PHA's termination decision (with the exception of internal case notes or other internal PHA documents).~~
- **Notification of the opportunity, upon written request made no later than 3 business days before the hearing, to examine before the hearing any PHA documents, including records and regulations, that are directly relevant to the hearing. The family shall be allowed to copy any such document at the family's**

expense. If the PHA does not make the document available for examination upon request by the complainant, the PHA may not rely on such document at the hearing.

- Notification of the right to be represented by counsel or other person chosen as the family's representative and to have such person make statements on the family's behalf (If the family brings legal representation, they must notify the PHA no later than 5 business days prior to the scheduled hearing date. If the family does not provide notice to the PHA at least five business days before the scheduled hearing date that they are being represented by legal counsel, the PHA may postpone the hearing to secure counsel. Lack of notice to the PHA of the presence of counsel representing the family may cause the PHA to reschedule to hearing to allow the PHA's counsel to be present.).
- Notification of the right to a private hearing unless the family requests a public hearing;
- Notification of the right to present evidence and arguments in support of the family's complaint, to controvert evidence relied on by the PHA or project management, and to confront and cross-examine all witnesses upon whose testimony or information the PHA or project management relies; and
- Notification that a decision based solely and exclusively upon the facts presented at the hearing.
- Notification that the PHA is requesting a copy of any documents or evidence the family will use at the hearing and will identify where (and may identify to whom) the documents or evidence must be delivered. The PHA's request for any such documents or evidence must be received no later than five (5) business days before the hearing date to allow the PHA sufficient time to review the documents or other evidence.

- The family may arrange, in advance and at its sole expense, for a transcript of the hearing. Any interested party may purchase a copy of such transcript

~~A notice will be sent to the family that the PHA is requesting a copy of any documents or evidence the family will use at the hearing and will identify where (and may identify to whom) the documents or evidence must be delivered. The PHA's request for any such documents or evidence must be received no later than five (5) business days before the hearing date to allow the PHA sufficient time to review the documents or other evidence.~~

~~The hearing officers require participants to conduct themselves in an orderly manner. Failure to comply with the direction of a hearing officer to obtain order may result in exclusion from the proceedings or in a decision adverse to the interest of the disorderly party.~~

The PHA's Formal Hearing Procedures

The hearing officers require participants to conduct themselves in an orderly manner. Failure to comply with the direction of a hearing officer to obtain order may result in exclusion from the proceedings or in a decision adverse to the interest of the disorderly party.

Prior to any formal hearing, the Family and any representatives testifying on its behalf will be required to be sworn in under penalty of perjury.

After a hearing date is agreed to, the family may request to reschedule, only upon a showing of "good cause," which is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. If a family cannot appear at a scheduled hearing and has not rescheduled the hearing in advance, the family must contact the PHA within forty-eight (48) hours prior to the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear.

If no "good cause" is shown for failing to appear at a scheduled hearing, the hearing officer may make a determination to postpone the hearing for no more than 5 business days or may make a determination that the family has waived his right to a hearing. Both the family and the PHA must be notified of the determination by the hearing officer. A determination that the family has waived its right to a hearing will not constitute a waiver of any right the family may have to contest the PHA's disposition of the grievance in an appropriate judicial proceeding.

At the hearing, the family must first make a showing of an entitlement to the relief sought and thereafter the PHA must sustain the burden of justifying the PHA action or failure to act against which the family is directed.

The family has the right to:

- Present written or oral objections to the PHA's determination
- Examine the documents in the file that form the basis of the PHA's action, and all documents submitted to the hearing officer. The family may review all documents relevant to the PHA's termination decision (with the exception of internal case notes or other internal PHA documents).
- ~~Copy any relevant documents at their expense~~
- Present any information or witnesses relevant to the issue of the hearing
- Request that PHA staff be available or present at the hearing to answer questions pertinent to the case
- Be represented by legal counsel, advocate, or other designated representative at their own expense.

If the family plans to bring a legal representative (attorney) to the hearing, the family must notify the PHA of this fact at least five business days prior to the scheduled hearing date. If the family fails to notify the PHA that they will be represented by an attorney, the PHA may postpone the hearing to secure counsel.

If the family requests copies of documents relevant to the hearing, the PHA will make the copies for the family and assess a fee according to the *Schedule of Fees and Charges*. The family should request these documents at least five business days prior to the hearing to allow the PHA to gather and copy the requested documents. In no case will the family be allowed to remove the file from the PHA's office.

~~In addition to other rights contained in this chapter, the PHA and the resident have a right to:~~

- ~~▪ Present evidence and any information relevant to the issue of the hearing~~
- ~~▪ Be notified if the family intends to be represented by legal counsel, advocate, attorney or another party no later than five (5) days prior to the hearing~~
- ~~▪ Examine and copy any documents to be used by the family prior to the hearing~~
- ~~▪ Have staff persons and other witnesses familiar with the case present~~

The formal hearing will be conducted by a hearing officer appointed by the PHA. The hearing officer will not be the PHA employee who made or approved the underlying decision or a subordinate of that person. In accordance with 24 CFR section 966.53(e), the hearing officer does not need legal training.

The hearing shall concern only the issue(s) for which the family has received the opportunity for hearing. Evidence presented at the hearing may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

No documents may be presented that have not been provided to the other party before the hearing. "Documents" includes records and regulations.

The hearing officer may ask the family for additional information and/or might adjourn the hearing early and order the parties to reconvene at a later date prior to reaching their decision in the case.

If the family misses a deadline ordered by the hearing officer without good cause, the action of the PHA will take effect and the family will not be granted another hearing on the matter at issue.

The hearing officer will determine whether the action, inaction or decision of the PHA is legal in accordance with HUD regulations and this ACOP based upon the evidence and testimony presented at the hearing. Factual determinations relating to the individual circumstances of the family will be based on a preponderance of the evidence presented at the hearing.

A notice of the hearing findings shall be provided in writing to the PHA and the family within fourteen (14) days and shall include:

- A brief summary of the decision and reasons for the decision
- If the decision involves money owed to the PHA, the amount owed and documentation of the calculation of the debt
- Notice that the California Code of Civil Procedure section 1094.6 governs the time within which judicial review must be sought
- The date the decision will be effective
- If the PHA's decision is upheld by the hearing officer, a notice of termination of tenancy will be forwarded to the legal entity representing the agency instructing the representative to proceed with filing the unlawful detainer (eviction) action in court

Except as provided below, the decision of the hearing officer will be binding on the PHA. The PHA shall take all actions, or refrain from any actions, necessary to carry out the decision unless the Executive Director determines, within a reasonable time and promptly notifies the resident of its determination.

The PHA is not bound by hearing decisions:

- Concerning matters in which the PHA is not required to provide an opportunity for a hearing
- That conflict with or contradict HUD regulations or requirements
- That conflict with or contradict federal, state or local law
- That exceed the authority of the person conducting the hearing

The PHA will send a letter to the participant if it determines the PHA is not bound by the hearing officer's determination within ten (10) days from the date this determination is made. The letter will include the PHA's reasons for the decision and will notify the resident that the matter will proceed to an unlawful detainer action (in which the resident retains all rights to defend against the action in court). All requests for a hearing, supporting documentation, and a copy of the final decision will be retained in the family's file (except for hearings involving reasonable accommodation, which are kept in a separate file).

If the hearing officer's decision upholds the PHA's decision to evict the resident, the PHA will proceed with filing an unlawful detainer (eviction) action against the family.

Explanation of Change: Clarification on Hearings Rights

5. Chapter 17 – Violence Against Women Act & Domestic Violence, Page 17-2 and 17-3

Definitions

The definitions in this section apply only to this Policy.

Actual or imminent threat: Physical danger that is real, would occur within an immediate timeframe, and could result in death or serious bodily harm. In determining whether an individual would pose an actual or imminent threat, the factors to be considered include: the duration of the risk; the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

Affiliated individual :A spouse, parent, brother, sister, child or a person to whom the resident stands in place of a parent or guardian, or any individual, resident, or lawful occupant living in the resident's household.

Confidentiality: The PHA will not enter information survivors provide to the PHA alleging domestic violence into a shared database or provide this information to any related entity.

Dating Violence: Violence committed by a person (a) who is or has been in a social relationship of a romantic or intimate nature with the survivor; and (b) where the existence of such relationship will be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; (iii) the frequency of interaction between the persons involved in the relationship.

Domestic Violence: Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, committed by a person with whom the he or she shares a child in common, committed by a person who is cohabitating with or has cohabitated with the survivor as a spouse or intimate partner, committed by a person similarly situated to a spouse of the survivor under the domestic or family violence laws of California, or committed by any other person against an adult or youth survivor who is protected from that person's acts under California's domestic or family violence laws.

Perpetrator: A person who commits an act of domestic violence, dating domestic violence, sexual assault, and / or stalking.

Safe unit: Refers to a unit that the victim of domestic violence, dating violence, sexual assault, and / or stalking believes is safe.

Spouse or Intimate Partner of the Victim: Includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (1) Fear for the person's individual safety or the safety of others; or (2) Suffer substantial emotional distress.

Economic Abuse

Meaning behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, or manipulation to—(A) restrict a person's access to money, assets, credit, or financial information; (B) unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage; or (C) exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.

Technological Abuse

Meaning an act or pattern of behavior that occurs within domestic violence, sexual assault, dating violence or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet enabled devices, online

spaces and platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other emerging technologies.”

Sexual Abuse: To cause substantial emotional or physical harm to the person, an affiliated individual, or a spouse/intimate partner.

Sexual Assault: Any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Bona Fide Claim: A bona fide claim of domestic violence, dating violence or stalking must include incidents that meet the terms and conditions set forth in the definitions above.

Explanation of Change: Including HUD’s additions to VAWA Definitions

6. Chapter 23 – Language Access Plan 23-2

FACTOR 1. The number or proportion of LEP persons served or encountered in the eligible service population in Sacramento

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be LEP, and may be entitled to language assistance with respect to a particular type of service, benefit or encounter. SHRA seeks to communicate with LEP persons who may be seeking information about SHRA’s programs (HCV and public housing), applicants, residents, and participants of programs, family members of applicants and participants, property owners/landlords, and contractors.

~~Analysis of the demographics from the most recent U.S. Census data from the American Community Factfinder survey underscores the need for language access services for Limited English Proficient individuals among Sacramento’s diverse population. According to 2014 data, 13% of Sacramento County’s population of 1,383,333 residents does not speak English “very well.” The percentage of LEP persons receiving assistance from SHRA programs is consistent with LEP data countywide. Combined program participants in 2015 totaled 15,410 with 14% or 2,213 identified as LEP persons.~~

~~The top five languages spoken by LEP individuals in Sacramento County are indicated below.~~

TABLE 1: Ranking Sacramento County LEP Languages

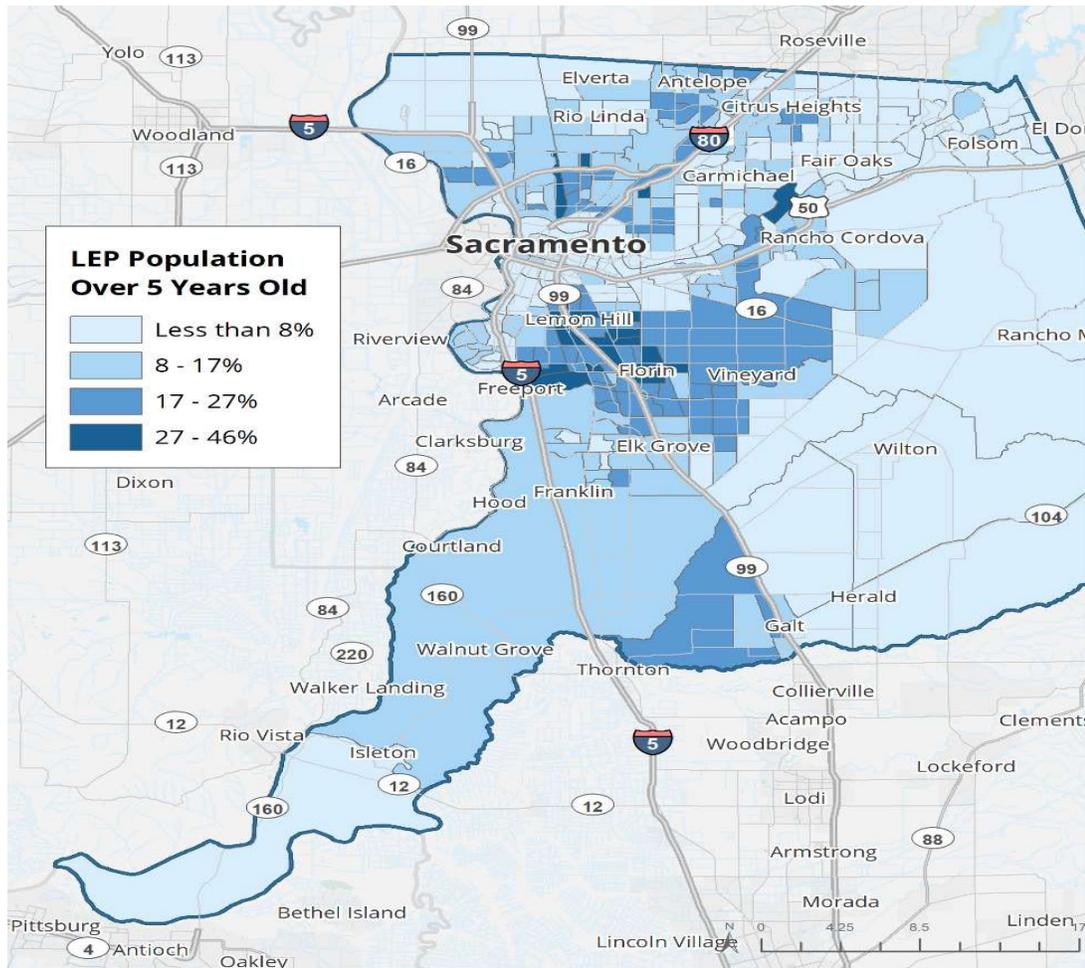
<u>Rank</u>	<u>Language</u>	<u>Percent</u>	<u>Population</u>
	Spanish	4.8%	67,060
	Chinese	1.30%	18,623
	Russian	1%	14,197
	Vietnamese	1%	13,198
	Hmong	<1%	10,333

(A full list of languages spoken by LEP populations greater than 1,000 in Sacramento County is available in Table 5.)

Distribution of Total LEP population. The Census’ 2022 5-year American Community Survey update estimates that there are 74,000 people in the City of Sacramento and 206,000 people in Sacramento County over 5 years of age who speak English “less than very well.” This is equivalent to 14% of the city’s population and 13% of the county’s population. This compares to 17% LEP residents in the State of California overall. The percentage of LEP persons receiving assistance from SHRA programs is slightly less than LEP data countywide. Combined program participants in 2024 totaled 13,978 with 12% or 1,685 individuals identified as LEP persons.

Figure 1 shows the distribution of LEP individuals in Sacramento County.

Figure 1.



City of Sacramento LEP Languages. Within the LEP groups, the languages with the highest population of residents who do not speak English well in the city of Sacramento are Spanish,

other Asian languages, Chinese, and other IndoEuropean languages. Proportionately, Chinese and Vietnamese are the highest LEP, followed by other Asian languages and Russian.

Figure 2. City of Sacramento LEP Languages

City of Sacramento	% LEP	# LEP
Spanish	37%	33,057
Other Asian Languages	42%	10,661
Chinese	62%	9,805
Other Indo European	32%	8,323,
Vietnamese	65%	5,882
Tagalog	38%	3,180
Russian	41%	2,391
Arabic	19%	1,352
Korean	21%	184

Note: Data from the American Community Survey relies on self-reporting and does not specify various dialects spoken within a language (e.g. for Chinese-speaking individuals, Mandarin, Cantonese, etc.) Source: 2022 American Community Survey.

County of Sacramento LEP Languages. Consistent with the city of Sacramento, within LEP groups, the languages with the highest population of residents who do not speak English well in the county of Sacramento are also Spanish, other Asian languages, Chinese, and other IndoEuropean languages. Likewise, Chinese and Vietnamese are the highest LEP proportionately in the county followed by other Asian languages and Russian.

Figure 3. County of Sacramento LEP Languages

County of Sacramento	% LEP	# LEP
Spanish	34%	71,814
Other Indo European	41%	30,879
Russian	54%	25,974
Chinese	57%	22,625
Other Asian	39%	21,246
Vietnamese	63%	17,840
Tagalog	35%	9,954
Arabic	21%	3,403
Korean	48%	2,153

SHRA LEP Distribution. Most of the federally funded services and programs at SHRA are targeted to low- and extremely low-income households; however, the U.S. Census LEP data is not cross-tabbed with household income to evaluate the potential income eligibility of LEP persons for HUD programs. As such, it must be assumed that the data above represents low-income populations, as well as populations overall.

The Public Housing and the Housing Choice Voucher programs compared with the community percentage of each language yields the following. The top five languages served at SHRA are shown in Table 1. However, SHRA strives to close the gap of services provided to Spanish speaking LEP persons participating in, applying to, or requesting information about its programs.

From the data for both the larger applicant pool and the lottery pool, we can see that similar ethnic groups of families with limited English capabilities were selected. In 2024, there were a combined total of 110,861 families on all SHRA wait lists. When these families are added to the number of families participating in HCV and those residing in Public Housing, the total number is 124,839, which yields the following percentages:

TABLE 1 SHRA LEP Persons on Waitlists and Existing Families

Top Five Languages	# of Families on Waitlist	% of Families on Waitlist
1. Persian	124	0.24%
2. Spanish	123	0.24%
3. Russian	108	0.21%
4. American Sign Language	79	0.15%
5. Pashto	75	0.15%

Total HCV and Public Housing waitlist applicant records is 42,773

TABLE 2: Comparison of SHRA LEP Participants with Sacramento County LEP Individuals

Housing Authority Top 6 Languages	# Housing Authority Families*	% of Housing Authority Families*	Sacramento County Ranking	Sacramento County %
Russian	453	2.91 %	3	<1%
Vietnamese	384	2.47 %	6	1%
Hmong	296	1.90 %	NA	<1%

Spanish	190	1.22 %	1	4.5%
Chinese	148	0.95 %	4	1.4%
Persian	84	0.54 %	N/A	N/A

Based on 2024 participant data, approximately 10% of 12,025 participating families receiving HCV assistance identified as LEP persons Outreach to Asian-language speakers has been more successful and SHRA continues to improve outreach to Spanish speaking individuals and families to ensure that it is meeting the local housing needs of the County’s largest identified LEP population.

In 2024, 2,881 participant families received public housing assistance, with approximately 8.5% identified as LEP persons. However, this reporting has significantly improved over the last year due to training provisions to ensure accurate information is collected as part of the recertification/intake process in order to capture all LEP families living in Public Housing or participating in the HCV program.

TABLE 3: Percentage of LEP Served by Program

SHRA Program	Percentage of Top 5 Languages Served
Housing Choice Voucher (HCV)	
Russian	3.17%
Vietnamese	2.36%
Hmong	2.17%
Spanish	0.97%
Chinese	0.75%
Public Housing	
Vietnamese	3.27%
Spanish	3.01%
Chinese	2.39%
Russian	1.09%
Romanian	0.57%

Most of the federally funded services and programs at SHRA are targeted to low- and extremely low-income households; however, the U.S. Census LEP data is not cross-tabbed with household income to evaluate the potential income eligibility of LEP persons for HUD programs.

The Public Housing and the Housing Choice Voucher programs compared with the community percentage of each language yields the following. The top five languages served at SHRA are the same top five languages spoken by LEP persons in Sacramento County. However, SHRA strives to close the gap of services provided to Spanish speaking LEP persons amongst programs.

From the data for both the larger applicant pool and lottery pool, we can see that similar ethnic groups of families with limited English capabilities were selected. In 2015, there were a combined total of 81,047 families remaining on all SHRA wait lists. When these families are added to the participating families in HCV and residing families in Public Housing for a total of 96,457, it yields the following numbers.

TABLE 2: SHRA LEP Persons on Waitlists and Existing Families

Top Five Languages	# of Families on Waitlist	% PHA Existing Families
1 Russian	299	0.82%
2 Vietnamese	83	0.22%
3 Hmong	69	0.19%
4 Ukranian	47	0.13%
5 Farsi	42	0.12%

TABLE 3: Comparison of SHRA LEP Participants with Sacramento County LEP Individuals:

Housing Authority Top 6 Languages	# PHA Families*	% of PHA Families*	Sacramento County Ranking	Sacramento County %
Russian	513	3.3%	4	<1%
Vietnamese	424	2.7%	3	1%
Hmong	351	2.2%	5	<1%
Chinese (Cantonese and Mandarin)	171	1.13%	2	1.3%
Spanish	176	1.1%	1	4.8%
Farsi	102	.77%	N/A	N/A

Based on 2015 participant data, approximately 15.81% of 12,529 participating families receiving HCV assistance identified as LEP persons (see APPENDIX A). Outreach to Asian languages has

been more successful and SHRA continues to improve outreach to Spanish speakers to ensure that it is serving the local housing needs of the county's largest identified LEP population.

In 2015, 2881 participant families received public housing assistance with .08% identified as LEP persons. Nearly 520 or 18% of public housing households did not have any language (English or other) recorded in the database. However, this reporting has significantly improved over the last year due to training provisions to ensure accurate information is collected as part of the recertification/intake process in order to capture all LEP families living in Public Housing.

TABLE 4: Percentage of LEP Individuals Served by Program

SHRA Program	Percentage of Top 5 Languages Served
HCV	95% — Russian 3.07% — Vietnamese 2.74% — Hmong 1.08% — Spanish .91% — Chinese
Public Housing	1.90% — Chinese 1.45% — Spanish 1.30% — Vietnamese .048% — Russian .30% — Farsi

FACTOR 2. The frequency with which LEP persons come into contact with the programs

On average, a family may come in contact with PHA staff at least three times a year for various reasons. Initial applications for Public Housing and Housing Choice Vouchers are accepted online. Once selected for housing, the lease-up process may take two (2) or three (3) visits or interaction with SHRA staff. After that, there is the annual recertification process, the annual inspection process, as well as any required updates to family income or family composition

On average, a family may come in contact with Housing Authority staff at least three times a year for various reasons. Initial applications for Public Housing and Housing Choice Vouchers are accepted online. Once selected for housing, the lease-up process may take two or three visits or interaction with SHRA staff. After that, there is the annual recertification process, the annual inspection process, as well as any required updates to family income or composition.

FACTOR 3. The nature and importance of the program, activity, or service provided by the Agency

~~The provision of affordable housing and housing assistance meets a critical need in any community. In Sacramento County, there are more than 2,800 families living in Public Housing and more than 12,500 families participating in the Housing Choice Voucher Program. Based on the impact on thousands of families in Sacramento County, the importance of the Housing Choice Voucher and Public Housing programs is high and prevents many families from becoming homeless. In the most extreme cases, the number of individuals who will experience homelessness over the course of a year can be estimated based on Point In-Time Count data, and for 2015, Sacramento's annualized count was 5,218 persons.¹ SHRA strives to ensure that affordable housing program opportunities are available and accessible to all eligible families to prevent the risk of homelessness.~~

The provision of affordable housing and housing assistance meets a critical need in any community. In Sacramento County, there are 2,881 public housing residents and 13,630 voucher holders

Housing Choice Voucher

To successfully participate in the HCV program, applicants and residents must be able to participate in compulsory activities such as the voucher briefing, the annual re-examination and inspection, and attendance at informal reviews or hearings when a family is denied assistance or termination from the program is proposed. Being able to understand SHRA's information is vital to obtaining a voucher, finding and moving into housing, remaining in the home, and remaining in the program through compliance with program requirements and regulations.

Public Housing

To participate successfully in SHRA's public housing program, applicants and residents must be able to complete the application, understand the occupancy policies, leases or rental agreements along with the house rules so that they can enjoy residing in their homes while abiding by those rules. Additionally, it is crucial that residents of public housing understand written notices about the program and their continued participation in the program.

FACTOR 4. The resources available and cost

~~The PHA is committed to spending the resources needed, within reason, to ensure LEP families are accommodated. With approximately 2,200 documented LEP families (or 14% of combined program participants) coming into contact with PHA staff approximately three (3) times a year, more than sixty five hundred (6,500) annual LEP contacts occur, mostly during inspections and annual recertifications.~~

The Housing Authority is committed to spending the resources needed, within reason, to ensure that LEP families are accommodated. With approximately 1,685 documented LEP families (or 10% of combined program participants) coming into contact with Housing Authority staff

¹ Sacramento Steps Forward: 2015 Point-in-Time Homeless Count Report. July 16, 2015.

approximately three times per year, more than 5,000 annual LEP contacts occur, mostly during inspections and annual recertifications.

SHRA has a contract with a ~~vendor~~ Stratus Translation that provides interpretation and translation services in more than one-hundred eighty (180) languages. Telephonic interpretation is seen as the most appropriate, cost-efficient, and accurate service to SHRA's LEP families. During the past year, SHRA provided telephonic interpretation services for LEP participants in fifteen (15) different languages

The PHA is committed to translating vital documents when it is necessary for the family to have equal access to housing services; however, the current cost to provide translated documents in all of the languages spoken by LEP persons in populations exceeding 1,000 is disproportionate to the frequency of the contact between these populations and SHRA and their participation in its programs. Using vital documents translated by HUD is the most cost-effective option. However, there are still instances when documents must be customized to contain specific information detailing the participant's particular case. Protocol is in place to ensure these participants are aware of access to free language access assistance.

Both the Housing Authorities for the City and County of Sacramento have approved the Agency's budget resolutions, which include annual funding to cover for on-call and translation services. In addition, SHRA identified several bilingual staff members to assist with translation and interpretation services in Spanish, Chinese (Cantonese and Mandarin), and Hmong.

Additionally, SHRA maintains positive relationships with social service agencies and community-based organizations that can assist with informal translations in a variety of languages.

It is a priority to use limited funding to maximize access to as many vital documents as possible.. An analysis of vital documents for translation in Appendix C identifies those documents that have already been translated by HUD or others, those documents for which the most vital information can be provided in a summary, rather than a translation of the entire document, and those documents where interpretation of the document will be available in multiple languages.

The Language Access Plan (LAP)

SHRA has prepared this LAP to address the identified needs of the LEP populations served, or potentially served by its programs. In compliance with federal guidelines, SHRA will make reasonable efforts to provide free language assistance for LEP clients in all of its programs so as to ensure that these persons have meaningful access to programs.

~~SHRA is committed to providing LEP persons through this Plan and will utilize bilingual staff, on-call telephone interpretations services, downloadable documents from websites, the 2-1-1 Sacramento information and referral service, and other resources as necessary to meet the public's LEP needs. Implementation of the LAP will likely continue to evolve over time in response to data such as the 2020 Census and new technology resources.~~

SHRA is committed to effectively serving LEP persons through this Administrative Plan, and will utilize bilingual staff, on-call telephone interpretations services, downloadable documents

from websites, and other resources as necessary to meet the public’s LEP needs. Implementation of the LAP will continue to evolve over time in response to data such as the 2022 American Community Survey and new technology resources.

A. How LEP Persons Are Identified

An LEP person is an individual who does not speak English as their primary language and who has a limited ability to speak, read, write, or understand English at a level that permits them to communicate effectively in the course of applying for, or receiving, agency services or benefits.

LEP residents are typically identified by staff when they first interact with SHRA—e.g., when an application is requested, though a phone call, etc.

Sacramento County Languages Spoken at Home

Using U.S. Census data from the American Factfinder website provides information on adults who speak English “less than very well” in SHRA’s service area population. The service area is defined as Sacramento County. According to this data, Sacramento’s population in 2014 was 1,383,333 with 69% or 951,293 residents who spoke proficient English.

TABLE 5: Ranking of LEP Languages in Sacramento County by Population Greater Than 1,000

Language	Percentage	Population
Spanish	4.8%	67,060
Chinese	1.30%	18,623
Russian	1%	14,197
Vietnamese	1%	13,198
Hmong	<1%	10,333
Tagalog	<1%	9,353
Hindi	<1%	3,734
Arabic	<1%	2,553
Laotian	<1%	2,351
Japanese	<1%	1,804
Persian	<1%	1,715
Urdu	<1%	1,473
Armenian	<1%	1,306

~~*This data relies on self-reporting and does not specify various dialects spoken within a language (i.e. Mandarin, Cantonese, etc.).~~

C. Points and Type of Contact with LEP Persons

Wait Lists

Public Housing

The Public Housing program has site-based wait lists. Various lists open and close at different times as the need for more applicants to occupy rental housing units arises.

Housing Choice Voucher.

The Housing Choice Voucher Program operates using a computerized and randomized lottery system. Wait list times vary and, because the demand for vouchers far outweighs the supply, the wait list is open only periodically.

Online Waitlist Information

~~When the wait lists are open for Public Housing or Housing Choice Vouchers, applications are accepted electronically in several languages via a web portal at www.sacwaitlist.com. This website has information in Spanish, Vietnamese and Russian indicating that assistance is available and how to contact the PHA. In addition to these languages, information on our website should also be provided in Chinese and Hmong.~~

~~When letters are mailed to families selected from the waitlist, they contain information urging those with language needs to contact the PHA for professional, reliable, and confidential language assistance.~~

~~The Public Housing and the Housing Choice Voucher programs disseminate information on waitlist opening and closing on the SHRA's webpage at www.shra.org. This site is also accessible has in Spanish, Russian, Vietnamese, Thai, Chinese and Korean. Additional languages may be added as necessary.~~

When the wait lists are open for Public Housing or Housing Choice Vouchers, applications are accepted electronically in several languages via a web portal at www.sacwaitlist.com. This website is google translate enabled and has information in multiple languages indicating that assistance is available and how to contact the Agency.

Letters

When letters are mailed to families selected from the waitlist, they contain information urging those with language needs to contact the Agency for professional, reliable, and confidential language assistance. Public Housing and the Housing Choice Voucher program disseminate information on waitlist opening and closing on the Sacramento Housing and Redevelopment Agency website at www.shra.org. This site is also google translate enabled with multiple

languages available. SHRA also has a contract with Stratus Translation Services used by Housing Choice Voucher staff.

Intake Appointments

SHRA has combined Intake staff to process applications for Public Housing and Housing Choice Voucher programs. Intake staff has procedures to follow to help new LEP applicants. Intake staff members show the LEP applicant the Language Identification Flashcard so they may point to their preferred language of communication.

~~Once a participant selects a language on the flashcard, Intake staff will contact the PHA's professional, contracted language vendor and request telephonic interpretation in the client's preferred language.~~

A conference call can be facilitated by Intake staff so that the interpretation-assisted call can take place at the participant's home or at the PHA office. Intake staff facilitates calls with the professional interpreter, the resident or participant, and SHRA staff. This takes a high degree of coordination; however, the benefit is that it helps to make language interpretation available at a time and place that is convenient for the family.

Generally, to fill out a full application and sign other necessary paperwork, the telephonic interpreter will interact with the staff interviewer who will explain to the interpreter what is being asked, and the interpreter will communicate that to the LEP family in their preferred language in a three-way call facilitated by intake staff. When the LEP family responds in their preferred language, the interpreter then communicates the information to the intake staff, who can transcribe information from the interpreter onto the English data form.

Intake staff will, with the family's permission, have the family's language input into the housing software system, which has a searchable field for "language." This helps the PHA determine how many families or individuals speak specific languages and better prepares for effective future communication with the family in their preferred language.

G. Monitoring and Updating the Language Access Plan (LAP)

~~SHRA will monitor the impact of its LAP by seeking the feedback of those who use LAP services. The LAP and demographics and the need for LEP services is reviewed as part of the 5-year Consolidated Plan. Changes in procedures will be incorporated on an ongoing basis ensure that SHRA maintains consistency with the LAP Plan and that daily service efforts adequately serve LEP clients.~~

SHRA will monitor the impact of its LAP by seeking feedback of those who use LAP services. Each program department at SHRA will participate in an annual review of the Language Access Plan to make sure Agency actions are consistent with the LAP. Demographics and the need for LEP services will be updated at least every two years. Changes in procedures will be incorporated on an ongoing basis to ensure that SHRA maintains consistency with the LAP, and that daily service efforts adequately assist LEP individuals.

SHRA will review the LAP periodically, but no less than every two years, to evaluate its overall effectiveness and any changes in LEP populations or needs. Modifications to the Plan may be based on:

- ~~• U.S. Census data~~
- ~~• Frequency of contact analysis of LEP participants and callers by staff~~
- ~~• Reports from SHRA’s database system on the numbers of program participants who are LEP and listing the language(s) used by LEP individuals~~
- ~~• Analysis of requests for interpreters and translation, as well as literacy skills of participants requesting language assistance: number of requests, languages requested, costs, etc.~~
- ~~• Assessment of whether existing language assistance services are meeting the needs of participants with LEP~~
- ~~• Review of vital documents and appropriateness of available translations~~
- ~~• Assessment of whether staff members understand the LAP and procedures~~
- ~~• Nature and importance of activities and information to LEP participants~~
- ~~• Availability of resources, including costs~~
- ~~• Whether identified sources for assistance are still available and viable~~
- Frequency of contact analysis of LEP clients and callers by staff
- Analysis of requests for interpreters and translation, as well as literacy skills of clients requesting language assistance: number of requests, languages requested, costs, etc.
- Reports from SHRA’s database system on the numbers of program participants who are LEP and listing the languages used by LEP clients
- Based on the above data, assessment of whether existing language assistance services are meeting the needs of clients who are LEP
- Assessment of whether staff members understand the LAP and procedures
- Review of vital documents and appropriateness of translations available
- Nature and importance of activities and information to LEP clients
- Availability of resources
- Whether identified sources for assistance are still available
- U.S. Census data/American Community Survey

SHRA employees, program applicants, HCV program participants, or public housing residents who receive a report, or become aware, that a LEP person believes they have not been provided with language assistance services, in accordance with this LAP, should report that information to the LAP Coordinator(s). Incidents will be documented for response and indicate whether any immediate action is needed to update the LAP.

APPENDIX A: ~~2015 SHRA HCV and Public Housing LEP Participants~~

Top Six Languages	Families	Percent	Program
A-FARSI	79	0.63%	HCV
A-FARSI	9	0.38%	PH

CA-CAMBODIAN	1	0.04%	PH
C-CHINESE	55	2.33%	PH
C-CHINESE CANTONESE	133	1.06%	HCV
CN-CANTONESE	1	0.04%	PH
D-CHINESE MANDARIN	18	0.14%	HCV
F-FRENCH	1	0.04%	PH
G-GERMAN	2	0.02%	HCV
H-HMONG	467	3.73%	HCV
H-HMONG	12	0.51%	PH
HI-HINDI	1	0.04%	PH
J-JAPANESE	1	0.01%	HCV
K-KOREAN	12	0.10%	HCV
K-KOREAN	2	0.08%	PH
L-LAOTIAN	5	0.21%	PH
L-SIGN LANGUAGE	13	0.10%	HCV
MA-Marshallese	1	0.04%	PH
M-MIEN	23	0.18%	HCV
M-MIEN	4	0.20%	PH
N-ROMANIAN	13	0.10%	HCV
O-PASHTO	3	0.02%	HCV
P-POLISH	1	0.01%	HCV
RO-ROMANIAN	4	0.20%	PH

R-RUSSIAN	492	3.93%	HCV
R-RUSSIAN	19	0.80%	PH
S-SPANISH	138	1.10%	HCV
S-SPANISH	62	2.62%	PH
TO-TONGAN	1	0.04%	PH
T-TAGALOG	1	0.04%	PH
U-UKRANIAN	118	0.94%	HCV
U-UKRANIAN	1	0.04%	PH
V-VIETNAMESE	468	3.74%	HCV
V-VIETNAMESE	52	2.20%	PH

APPENDIX A: 2024 SHRA HCV and Public Housing LEP Participants

Language	# Participants	Program
Afrikaans	2	hcv
American Sign Language	14	hcv
Arabic	8	hcv
Armenian	6	hcv
Azerbaijani	1	hcv
Bosnian	2	hcv
Cambodian	1	cnv
Chinese (Cantonese)	102	hcv
Chinese (Cantonese)	26	cnv
Chinese (Mandarin)	17	hcv
French	1	hcv
German	2	hcv
Hindi	1	hcv
Hmong	296	hcv
Hmong	2	cnv
Khmer	2	hcv
Korean	7	hcv
Korean	1	cnv
Lao	5	hcv
Lao	4	cnv

Mien	20	hcv
Mien	2	cnv
Pashto	11	hcv
Persian	84	hcv
Persian	4	cnv
Polish	1	hcv
Punjabi	1	hcv
Romanian	15	hcv
Romanian	6	cnv
Russian	432	hcv
Russian	11	cnv
Samoan	1	hcv
Spanish	132	hcv
Spanish	32	cnv
Tagalog	3	hcv
Tagalog	1	cnv
Ukrainian	72	hcv
Uzbek	1	hcv
Vietnamese	321	hcv
Vietnamese	35	cnv

APPENDIX B: 2015 SHRA HCV and Public Housing Ranking of LEP Participant and Waitlist

HCV Program Languages		
Total Number of Participants: 13,630		
Top Six Languages	# of HCV Families	Percent
1. Russian	432	3.17%
2. Vietnamese	321	2.36%
3. Hmong	296	2.17%
4. Spanish	132	0.97%
5. Chinese	102	0.75%
6. Persian	84	0.62%

HCV Program Languages		
Total Number of Participants: 12,884		
Top Six Languages	# of HCV Families	Percent
1 Russian	492	3.93%

2 Vietnamese	469	3.74%
3 Hmong	468	3.74%
4 Spanish	138	1.10%
5 Chinese Cantonese	133	1.06%
6 Ukrainian (Emerging)	118	0.94%

Public Housing Program Languages		
Total Number of Participants: 2,881		
Top Five Languages	# of HCV Families	Percent
1 Spanish	62	2.62%
2 Chinese	55	2.33%
3 Vietnamese	52	2.20%
4 Russian	19	0.80%
5 Hmong	12	0.51%

Public Housing Program Languages		
Total Number of Participants: 2,881		
Top Five Languages	# of HCV Families	Percent
1 Spanish	62	2.62%
2 Chinese	55	2.33%
3 Vietnamese	52	2.20%
4 Russian	19	0.80%
5 Hmong	12	0.51%

Top 5 Program Languages for Combined Programs with Waitlists		
Total Participants: 81,322		
Top Five Languages	# of Applicants	Percent
1. Persian	124	0.15%
2. Spanish	123	0.15%
3. Russian	108	0.13%

4. American Sign Language	79	0.10%
5. Pashto	75	0.90%

Combined Programs with Waitlists		
Total waitlist application records: 81,047		
Top Five Languages	# of Families on Waitlist	PHA Existing Families
1 Spanish	437	0.54%
2 Russian	418	0.52%
3 Vietnamese	355	0.44%
4 Hmong	176	0.22%
5 Chinese	147	0.18%

Applicant Pool		
Total waitlist application records: 35,186		
Top Five Languages	# of Applicants	Percent
1 Russian	307	0.87%
2 Other	250	0.71%
3 Vietnamese	241	0.69%
4 Spanish	229	0.65%
5 Hmong	138	0.39%

Explanation of Change: Updating LAP plan and data

7. Glossary, Page G-19

TEMPORARY DISPLACEMENT: Temporary Relocation of Residents. Residents who will not be required to move permanently, but who must relocate temporarily, e.g., to permit property repairs.

Explanation of Change: Added HUD’s Definition of Temporary Displacement

HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN CHANGES

1. Chapter 1 – Statement of Policies and Objectives, page 1-2

The PHA shall implement policies compliant with HUD’s final Housing Opportunity Through Modernization Act (HOTMA) upon direction from HUD and access to the revised HUD-50058 in the Housing Information Portal (HIP). Until such time as the HOTMA polices can be implemented, the PHA shall continue to apply pre-HOTMA polices as outlined in the PHA Administrative Plan.

Explanation of Change: Disclosure of pending upcoming changes

2. Chapter 4 – H. SPECIAL ADMISSIONS, page 4-6

Family Unification Program (FUP) is a program under which housing assistance is provided under the Housing Choice Voucher (HCV) program in partnership with Public Child Welfare Agencies to two groups:

1. Families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care; and
2. Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act and are homeless or are at risk of becoming homeless at age 16 or older. As required by statute, ~~a FUP voucher issued to such a youth may only be used to provide housing assistance for the youth for a maximum of 36 months.~~

The Family Unification Youth (FUPY) or Foster Youth to Independence (FYI) voucher provides 36 months of assistance. Families may qualify for a 12-month extension if they meet one of the statutory requirements below:

- Participating in the Family Self-Sufficiency (FSS) Program.
- Engaging in education, workforce development, or employment activities.
- Being the parent or other household member responsible for the care of a dependent child under the age of 6 or for the care of an incapacitated person.
- Regularly and actively participating in a drug addiction or alcohol treatment rehabilitation program.
- Inability to comply with the FSS program, engage in education, workforce development, or employment activities, due to a documented medical condition.

FUPY/FYI families may qualify for up to two subsequent 12-month extensions if they meet one of the statutory requirements as listed above, for a maximum total program assistance of 60 months. HCV program participation will be terminated if a family fails to adhere to program requirements, no longer qualifies for an extension, which will be verified annually, or reaches a maximum total of 60 months of HCV program assistance, whichever comes first.

Explanation of Change: Regulation change to allow additional time for FUP and FYI youth vouchers meeting certain HUD requirements.

3. Chapter 6 – TTP page 6-2.

HUD has five allowable deductions from annual income:

- Dependent Allowance: \$480 (**adjusted annually for inflation**) each for family members (other than the head or spouse/partner) who are minors, and for family members who are 18 and older who are full-time students or who are persons with disabilities.
- Elderly/Persons with Disabilities Allowance: \$525 (**adjusted annually by HUD**) per family for families whose head or spouse/partner is 62 or over or a person with disabilities.

Explanation of Change: Update due to HOTMA regulation change

4. Chapter 6- Q. CHILD CARE EXPENSES, page 6-15

The PHA will require the family to provide verification of childcare expenses. Such verification may include but is not limited to:

- ~~Copies of cancelled check or money order receipts from a childcare service;~~
- ~~Receipts from an unlicensed childcare provider that has been third-party verified by a PHA employee; or~~
- ~~Receipts, letters, or a printout from a licensed agency providing the childcare service.~~
- Current cost statement from the childcare agency (dated 60 days from the date of request).
- Childcare from an individual provider-canceled checks or money order receipts for the last 3 months or previous year's tax return with the childcare expense exemption.

Explanation of Change: Update to align with current PHA annual recertification requirements

5. Chapter 6 – TTP, pages 6-15 and 6-17

Exemption to Continue the Child Care Expense Deduction

A family whose eligibility for the childcare expense deduction is ending may request a financial hardship exemption to continue the deduction. **If the family is granted a hardship exemption, they are required to report to the PHA within 30 days if the circumstances that made the family eligible for the hardship exemption are no longer applicable.**

Hardship Exemptions to the Health and Medical Expenses Deduction

The family must have been receiving a deduction from annual income of qualified health and medical expenses exceeding 3% of annual income. Two categories of hardship exemption to the 10% threshold for unreimbursed medical expenses. **If the family is granted a hardship exemption, they are required to report to the PHA within 30 days if the circumstances that made the family eligible for the hardship exemption are no longer applicable.**

Explanation of Change: Update due to HOTMA regulation change

6. Chapter 7 – Verification, page 7-4

Current assets including assets of \$5,000 **(\$50,001 or more (adjusted annually for inflation) upon HOTMA implementation)** or more disposed of for less than fair market value in the last two years.

Explanation of Change: Update due to HOTMA regulation change

7. Chapter 7 – Verification, page 7-7.

Zero-Income Status

Families claiming to have no income will be required to complete a zero-income packet and provide proof that prior income has ended. ~~There will be a review of income every 90 days, and the family will be required to provide all receipts/statements as requested.~~
Recertifications will be processed for any change in income.

Explanation of Change: Update due to HOTMA regulation change

8. Chapter 8 – Verification, page 7-8.

I. VERIFICATION OF ASSETS

The PHA will accept a family's self-certification of net family assets equal to or less than \$50,000 (adjusted annually for inflation) and anticipated income earned from assets at admission and reexamination. Self-certified assets accepted at reexamination must be fully verified every three years.

Explanation of Change: Update due to HOTMA regulation change

9. Chapter 8: Voucher Issuance and Briefings – Section F page 8-4

The voucher specifies the unit size for which the family is qualified and briefly describes how the program works and explains the family obligations under the program. Admission to the program occurs when the lease and contract become effective.

~~After the issuance of the voucher~~ **household initially leases up in their approved unit,** the

subsidy standard will not be increased for additions to the family except as described in Chapter 5, under the “Exceptions to Subsidy Standards” section of this Administrative Plan.

Explanation of Change: Language updated to align with PHA policy for current participants

10. Chapter 10 – Housing Quality Standards and Inspections, page 10-3

Re-inspection(s)

The family and owner are provided a notice of the inspection appointment by phone or mail. If the family misses two inspection appointments, the PHA will consider the family to have violated a family obligation and their assistance may be terminated. Program Eligibility may also be jeopardized for missed inspections for which the tenant is responsible.

Upon a second missed inspection, the PHA will propose termination of assistance. A Mandatory Tenant Conference (MTC) will not be scheduled.

Explanation of Change: Streamlining process

11. Chapter 12 – Recertification, page 12-2

Verification of Information

All information affecting the family's continued eligibility for the program and the family's Total Tenant Payment (TTP) will be verified in accordance with the verification procedures according to HUD guidelines. Verifications used for recertification must be dated within 60 days from the PHA request date 120 days of the date received by the PHA. For fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

Explanation of Change: Update due to HOTMA regulation change

12. Chapter 12 – Recertification, pages 12-3 and 12-4

Increases in Income

Program participants must report all changes in household income in writing within thirty (30) days of the change. The PHA will conduct interim recertifications for any income increases for families who:

- Are Family Self Sufficiency program participants or;
- Are Home Ownership program participants or;
- Have zero income or;
- Have an Earned Income Disregard (EID) at the end of the 24-month period or;
- Have a repayment agreement for a debt owed to the PHA or;
- Failed to report a change timely.
- Request by the participant in writing to have the increase processed
- The family's adjusted income has increased 10% or more in annual adjusted income.

- The PHA will not consider any increases in **earned income** when calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle.

~~The PHA will not process an interim rent adjustment if all reported changes result in an overall income increase, unless requested in writing by the participant. The PHA will not conduct an interim reexamination if a family reports an increase in income within three months of their next annual reexamination date. Families who delay reporting income increases until the last three months of the recertification period may be subject to retroactive rent increases in accordance with PHA policy.~~

PHA Errors

If the PHA makes an error that causes a decrease in the family's portion of the rent, the PHA will process the correction retroactively to the effective date of when the action was made. ~~If the family was overcharged tenant rent due to a de minimis error in income determination (i.e., no more than \$30 per month or \$360 per year in adjusted income), payment shall be made to the family by check.~~

Explanation of Change: Update due to HOTMA regulation change

13. Chapter 13, Moves with Continued Assistance, page 13-2

C.RESTRICTIONS ON MOVES

The PHA will deny permission to move with continued assistance:

- ~~● If the family's annual recertification is due within 120 days or an interim change is pending and the family is moving voluntarily, the move will be delayed until the certification is completed. Upon receipt of a request to move, the PHA will begin the recertification process. The recertification will be expedited promptly after submission of all paperwork. This will ensure that families lease up a new unit that is affordable to them based on current information. If the family is moving involuntarily, efforts will be made to expedite the recertification also for the same reason, but the family will not be delayed in moving.~~

Explanation of Change: Removing barrier to the move process

14. Chapter 15 – Denial of Termination of Assistance/ Termination – Asset limit for Eligibility and Continued Assistance, pages 15-3

Eligibility and continued assistance asset limit to participate in program assistance includes net family assets that exceed \$100,000 (**adjusted annually for inflation**); and/or

Families are ineligible for assistance if they own real property suitable for occupancy. The following exceptions apply:

- A family that receives assistance for the property from the Housing Choice Voucher Program
 - Manufactured home
 - Homeownership Option
- Property jointly owned with someone else, and occupied by the other owner who is not a member of the household receiving benefits
- A victim of domestic violence, dating violence, sexual assault, or stalking
- A family that is offering the property for sale
- Unit not suitable for occupancy because it does not meet the disability-related needs for all members of the family
- Not sufficient for the size of the family
- Location is a hardship for the family
- Is unsafe due to physical condition
- Property is not zoned for residential occupancy per local or state laws

Enforcement of the asset limitations defined above shall be enforced through initiation of the termination process for current participants at annual or interim recertification.

Explanation of Change: Update due to HOTMA regulation change

15. Chapter 18 - Procedure for Requesting an Informal Hearing for Participants

Any request for an appeal must be received in writing no later than **15 calendar days** from the date of the PHA's notification letter of adverse action.

Explanation of Change: Adding clarification of time

16. Chapter 25, Insufficient Funding, page 25-1

The PHA may implement the following cost savings measures prior to terminating HAP contracts:

- Stop absorbing new portable families
- Stop issuing vouchers to new applicants
- Pulling back outstanding vouchers for applicants searching for housing that have not resulted in an executed HAP contract
- Consider termination or repayment agreements for families that misrepresent income and other anti-fraud efforts.
- This is not an exhaustive list; we will evaluate and consider other measures.

Explanation of Change: Adding HUD recommendations for clarification

17. Chapter 25, Insufficient Funding, page 25-2

C. RESTORATION OF FUNDING

When funding is available, vouchers will be issued in the following order to assist:

1. Participant families whose housing contracts were terminated due to insufficient funds **in order of oldest admission dates first;**
2. Families who were terminated from the program due to insufficient funds **following the termination of contracts for 180 days;**
3. **PBV families who gave notice and chose to move without assistance during the insufficient funding period when the PHA did not have tenant based vouchers available;**
4. **PBV families who choose to move with a tenant based voucher;**
5. Families eligible for special ~~programs~~ **purpose vouchers** as determined by HUD;

Explanation of Change: Clarifying order or reinstatement if vouchers or assistance is terminated due to insufficient funding

18. Chapter 27 Language Access Plan

Complete chapter updated

Explanation of Change: Updated with current data and information, see Admin Plan for updated information