

UPLAND HOUSING AUTHORITY

SUMMARY OF PROPOSED REVISIONS TO THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN EFFECTIVE 4/1/2015

- 1. Topic/Description:** **Requesting documentation for changes reported by the family.** Current policy states that the family must provide documents to UHA within 15 days of receiving UHA's request.

UHA proposed policy would require the family to provide requested documents to UHA within 15 days from the date of UHA's request.

Change Type: Discretionary
Location: 11-II.D
Reason: To ensure consistency with other UHA policies regarding deadlines to provide documents.

- 2. Topic/Description:** **Inspections:** Current policy requires an adult family member to be present at inspections of assisted units. UHA proposes to change policy to allow any adult approved by the family to be present at inspections of the assisted unit.

Change Type: Discretionary
Location: 8-II.A
Reason: Allows flexibility to participant. May help prevent missed appointments for scheduled inspections.

- 3. Topic/Description:** **Inspections:** Current policy states that UHA will complete the initial inspection of the new assisted unit within 15 days of submission of the Request for Tenancy Approval (RTA), but does not address what happens when the RTA is submitted but the unit is actually not ready for inspection.

UHA proposed policy would add language to state that UHA will inspect a new unit within 15 days of submission of the Request for Tenancy Approval (RTA) as required by regulation, except when the unit is not available for inspection on the date the RTA is submitted. In the event that the unit is not available for inspection when the RTA is submitted, the 15-day period will begin on the date the unit is available for inspection as specified on the RTA. If the unit is not available for inspection within 15 days of the date the RTA is submitted, UHA will reject the unit and the family will be required to search for a new unit or submit a new RTA for the same unit.

Change Type: Discretionary
Location: 8-II.B
Reason: Clarifies policy to ensure that inspections are conducted within required timeframes and that the unit is available for inspection within a reasonable time after the RTA is received.

- 4. Topic/Description:** **Inspections:** Currently UHA provides a maximum of two scheduled annual inspections. The inspection must pass in these two opportunities.

UHA is proposing to change to a maximum of three scheduled inspections/opportunities to pass the annual inspection. The unit would generally still be required to pass in two inspections, but would allow for UHA to schedule a third inspection under certain circumstances.

The third opportunity to pass the inspection would be provided only if the unit fails to pass the first two appointments as a result of one no-show or fail for tenant-caused damages and one fail for damages that are the owner's responsibility. UHA would continue to terminate the family's assistance if the unit fails to pass the inspection on two occasions as a result of any combination of tenant-caused damages and no-show appointments. UHA would continue to enforce owner compliance through HAP abatement and/or HAP contract termination if the unit fails two inspections as a result of damages that are the owner's responsibility.

Change Type: Discretionary

Location: 8-II.F and 8-II.H
Reason: Current UHA policy suggests that UHA will terminate the family's assistance or abate/terminate the HAP contract in the event that the unit fails to pass two inspections, regardless of which party was responsible for the failed inspection. This policy helps to address unintended consequences by better identifying the responsible party and ensuring that enforcement actions are applied appropriately.

5. **Topic/Description:** **Inspections:** Currently the UHA is required to inspect assisted units every 12 months. As part of the 2014 Appropriations Act, housing authorities now have the flexibility to inspect assisted units up to every 24 months. UHA is proposing a policy that would allow for inspections up to every 24 months, but reserving the right to require an annual inspection at any time. UHA's proposal would also include policy that would accept the results of inspections performed by HUD or for other housing programs such as HOME or LIHTC (authorization also given for this in the 2014 Appropriations Act).

Change Type: Discretionary

Location: 8-II.C

Reason: Reduce inspection costs given reduced program funding. Proposed policy would allow UHA to switch to a 24 month inspection cycle but also to be able to change back to a 12 month cycle or other cycle at any time. UHA would also increase the number of quality control inspections at randomly selected assisted units if it changed to a 24 month inspection cycle as a monitoring measure.

6. **Topic/Description:** **Waiting List Management:** Currently applicants on the waiting list are required to report changes in residence and telephone numbers (change of contact information), and only have the opportunity to update other changes like family size or composition, household income, or preference status, as part of UHA's discretionary waiting list update/purge process. The proposed change would keep the requirement to report changes in residence and telephone number contact information, but would also allow applicants to report other application updates at any time. The waiting list update/purge process would also change, and would no longer provide an opportunity to make changes to an application because this opportunity would already be available whenever the applicant would want or need to make changes.

Change Type: Discretionary

Location: 4-II.E and 4-II.F

Reason: Allow waiting list applicants to update important application information at any time, possibly enhancing an applicant's chance of being selected sooner from waiting list because of UHA having more current and accurate on file.

7. **Topic/Description:** **Oral Interpreter Services:** Current policy is silent on UHA's use of professional translation services for improving access to services for persons with limited English proficiency. The proposed policy now states that the UHA may utilize a language line for telephone interpreter services.

Change Type: Discretionary

Location: 2-III.B

Reason: Improve access to UHA services by utilizing telephone interpreter services when needed.

8. **Topic/Description:** **Verification of Residence or Address:** Current policy states that applicants must provide two forms of acceptable residence or address from a specific list of documents. The proposed policy states that one form of acceptable residence or address must be provided from this list AND another form from a secondary document list.

Change Type: Discretionary

Location: 7-II.I

Reason: Many applicants cannot provide two documents from the list of primary residency/address documents in the Administrative Plan. Allowing for one document from this list and another from a secondary list of documents will allow the applicant to more easily demonstrate residency or address in the City of Upland for purposes of eligibility.