

	ACOP	S8 Admin Plan	Lease & Comm. Policies	Action	Existing Wording	Proposed Revisions (in bold)
1	ACOP, Chapter I, (E), page 7 and Appendix V	n/a	Lease, Article IX, (14), pages 10 - 11	Added to initiate use of a "bar" letter.	Previous language did not mention a barring policy.	<u>In accordance with s. 810.09, F.S., PHCD is adopting a No Trespassing and Barring Policy for its Public Housing developments, with the goal of combating drugs, crime, and other quality of life issues in County properties. This policy applies to non-residents and uninvited guests who are presumed to be without a specific legitimate purpose on the property, and/or engage in behaviors that substantially interferes with the residents' right to a safe and peaceful enjoyment of the premises. These persons may be served with a Non-Trespassing Notice and are subject to permanent barment from the premises.</u>
2	ACOP, for removal of family member: Chapter II, (C)(6)(c), pg 22; Chapter IV, (C)(6)(iv), pg 53; for 3rd party verification: Chapter II, (G)(5) and (G)(8)(e) & (i), pg 30, 32-33; Chapter VI, (C)(5), page 64	S8 Admin Plan, for removal of family member: Chapter 2, (2.2)(E)(3)(d), page 17; Chapter 5, (5.2)(C)(1), (a) & (d), page 50; for 3rd party verification: Chapter 2, (2.11)(D), page 33; (2.11)(G), (6) & (9), pgs 35-36	n/a	Added alternative method to remove family member and for third party verification of contribution or self-certification of income	Previous language required a notarized statement.	<p>For removal of family member: <u>As an alternative to the notarized statement, a written statement may be provided, which must signed by the adult family member being removed upon identification, the head of household, and witnessed by the PHCD representative.</u></p> <p>For 3rd party verification: <u>...or provide a written statement witnessed by the PHCD representative, upon identification of the contributor.</u></p>

	ACOP	S8 Admin Plan	Lease & Comm. Policies	Action	Existing Wording	Proposed Revisions (in bold)
3	ACOP, Chapter II, (F)(2)(a), page 25 and Appendix 1 - Definitions pages 5	S8 Admin, Chapter 2, (2.10)(B), page 30 and Attachment A - Definitions, page 4	n/a	Revised to comply with Appropriation s Act (Federal Register Vol. 79 #122 dated 6-25-14).	Extremely low income is defined as less than 30% area median income.	Extremely low income is defined <u>as families whose incomes do not exceed</u> 30% area median income <u>or the Federal poverty level, whichever is higher.</u>
4	ACOP, Chapter II, (F)(8)(a) thru (c), pages 27-29	S8 Admin Plan, Chapter 2, (2.10) (E), pgs 31-32; Chapter 25, (25.1)(A), page 83	n/a	Added new waiting list preferences.	<p>ACOP: Included preferences for ALF, Veterans and Wheelchair.</p> <p>S8Admin: N/A - there is no current language on preferences.</p>	<p>ACOP: Added preferences for <u>Homeless Program & Special Needs</u>. Also, added sections on how to handle <u>No Preference, Denial of Preferences and Changes in Preference.</u></p> <p>S8 Admin: Added Types of Preferences for <u>PBV/PBA, Elderly/Disabled, Extremely Low Income for income targeting, Local Miami-Dade Residency (24 CFR 982.207 (b)(1)(ii)), and Veterans</u>. Also, added sections on how to handle <u>No Preference, Denial of Preferences and Changes in Preference.</u></p> <p>S8 Admin Plan, PBV Chapter: <u>PHCD will comply with all new notices and regulations released by USHUD including waiting list preferences.</u></p>

	ACOP	S8 Admin Plan	Lease & Comm. Policies	Action	Existing Wording	Proposed Revisions (in bold)
5	ACOP, Chapter II, (G)(8)(a) and Chapter XII, (A), pages 31 & 85	S8 Admin Plan, Chapter 2, (2.11) (G) & (G)(7), pages 34 - 36; Chapter 8, (8.1), page 61	n/a	Deleted all references to PIH Notice 2013-03 which expired on 3/31/15.	<p>ACOP & S8 Admin:</p> <p>a. PHCD has implemented the following temporary provisions pursuant to the PIH Notice 2013-03: - Streamlined re-examination for elderly families and disabled families on fixed income (applies only to participants of Public Housing, Housing Choice Voucher, and Section 8 Moderate Rehabilitation). It does not require the participant to provide third party verification (e.g. paystubs, payroll, unemployment benefits) and allows PHAs to use the most recent 12 months income information in EIV. Nevertheless, income sources not available in EIV should be verified by third party sources. -Self-certification of assets for less than \$5,000 (applies to both applicant and participant). It does require third party verification (e.g. bank statements) for net assets of more than \$5,000 value and the income derived from those assets. PHAs are allowed to obtain the family's self-certification of the assets value and anticipated income.</p> <p>ACOP & S8 Admin:</p> <p>PHCD reserves the right to implement PIH Notice 2013-03 as needed to relieve administrative burden.</p>	Deleted since the HUD notice is no longer applicable. Clients can no longer self-certify.
6	ACOP, Chapter VI, (C) and Chapter VII, A(2)(b), pages 63-64 & 69	S8 Admin, Chapter 15, (15.2)(B)(1), page 73	n/a	Revised to prevent zero income families from not paying rent until next annual re-exam and to allow FSS clients to accumulate escrow.	Increases in income between annual recertifications will not result in rent increase until the next annual recertification.	<p>Increases in income between annual examinations will not result in rent increase until the next annual reexaminations <u>except in the following circumstances where an interim will be conducted:</u></p> <p><u>i. If the family previously had zero income; or</u></p> <p><u>ii. FSS participants with an income increase that may be beneficial for increasing their escrow account.</u></p> <p><u>Failure to report an increase in income will result in a back charge retroactive to the effective date of the change.</u></p>

	ACOP	S8 Admin Plan	Lease & Comm. Policies	Action	Existing Wording	Proposed Revisions (in bold)
7	ACOP, Chapter IX, (A)(3)(b) and (D)(1)(a), pages 76 & 78	n/a	Comm. Policies, Section XXIV, (E)(2)(a), page 25	Added to prevent erroneous reinstatements in cases where PH regulations differ from LIHTC regulations.	N/A - there is no current wording permitting LIHTC staff to attend informal reviews or hearings.	<p>ACOP: <u>b. LIHTC representatives may attend applicant informal reviews to provide guidance on LIHTC regulations and to explain reasons for denial of assistance.</u></p> <p>ACOP & Comm. Policies: <u>LIHTC representatives may attend resident hearings to provide guidance on LIHTC regulations and to explain reasons for denial of assistance.</u></p>
8	ACOP, Chapter IX, (D) thru (G), pages 78 - 81	n/a	Comm. Policies, Section XXIV, pages 21-29	Revised Hearing Policy for clarification & consistency between ACOP & Community Policies & to add OTAC.	Previous language in the ACOP's Grievance Policy section was missing language that can be found in the Grievance Policy section of the Community Policies & vice-versa. Included various references to "Resident Council Representation."	Various revisions for consistency between the ACOP and Community Policies. Replaced all references to "Resident Council Representation" with " <u>Overall Tenant Advisory Council (OTAC)</u> ." See documents for details.
9	n/a	S8 Admin, Chapter 5, (5.1)(E)(2), page 48; Chapter 11, (11.1), page 67	n/a	Revised to comply with Appropriation's Act (Federal Register Vol. 79 #122 dated 6-25-14.	2. The utility allowance used to calculate the gross rent shall be based on the actual size unit selected by the family regardless of the size authorized on the voucher;	2. The utility allowance used to calculate the gross rent shall be based on <u>the lower of either</u> the actual size unit selected by the family or the size authorized on the voucher;

	ACOP	S8 Admin Plan	Lease & Comm. Policies	Action	Existing Wording	Proposed Revisions (in bold)
10	n/a	S8 Admin Plan , Chapter 29, (29.3), page 105	n/a	Deleted	Participants who have been terminated, within the past ninety (90) days, from the program may request a final review of their case, if they failed to request a hearing within the time period allowed by this plan. PHCD will review the case and determine whether reinstatement is appropriate due to agency error or mitigating circumstances as delineated in Section 27.1. To be reinstated, the participant must be in compliance with the program. If the participant is reinstated, HAP will be paid to the landlord retroactive to the date of the effective End of Participation so long as the participant continues to reside in the previously assisted unit.	N/A - Deleted. No new language.
11	n/a	S8 Admin Plan , Chapter 16, (16.4), page 74	n/a	Added to deny an elective move under certain conditions.	N/A - there is no current language.	Added a new section regarding <u>Denial of Assistance for Tenant Moves.</u>
12	ACOP , Chapter V, (D)(3), page 60	n/a	Lease , Article VIII, page 9	To reduce vacancies, revise number of days for resident transfers.	The resident will then have 30 days in which to move...	The resident will then have <u>15 calendar days</u> in which to move...
13	ACOP , Chapter VI, (G), pages 67- 68	n/a	n/a	Added	N/A - there is no current language.	Added new language regarding risk assessment for residents whose tenancy may pose a "direct threat" to self or others.
14	n/a	S8 Admin Plan , Chapter 10, (10.2), page 65	n/a	Added to comply with HUD PIH Notices 2012- 15 & 2013- 17.	N/A - there is no current language.	<u>In accordance with PIH Notices 2012-15 and 2013- 17, owners and tenants may submit photographs verifying repairs for Annual and Complaint inspections only. Photos will be considered on a case by case basis and must be similar to images provided by the field inspector. Units where verification of repair by photographs are used, may be subject additional field inspections.</u>

	ACOP	S8 Admin Plan	Lease & Comm. Policies	Action	Existing Wording	Proposed Revisions (in bold)
15	n/a	n/a	<p>Lease, Article V, last paragraph, page 7.</p> <p>Comm. Policies, Exhibit 1, pages 35 - 37</p>	Added	<p>Lease: Failure to pay these and other charges timely after two weeks of notice by Landlord is grounds for eviction</p> <p>Comm. Policies: N/A - there is no current language.</p>	<p>Lease: Failure to pay these and other charges timely after two weeks of notice by Landlord is grounds for eviction. <u>All charges, fees and fines referenced above and throughout this document shall be defined as “additional rent” for eviction filing purposes and will be collectible in the event an eviction is filed against the tenant.</u></p> <p>Comm Policies: <u>All Charges/Fines/Fees listed below and throughout this document will be considered as additional rent for eviction filing purposes.</u></p>
16	ACOP, Chapter VIII, (A)(22), page 73	n/a	n/a	Added in response to HUD OIG audit report # 2015-PH-02, dated July 21, 2015.	N/A - there is no current language.	<u>In accordance with 24 CFR § 960.261, PHCD may evict or terminate the tenancies of families who are over income, defined as over 80% of the area median income (AMI), subject to the following exception. Unless PHCD is required to do so by local law, PHCD may not evict or terminate the tenancy of a family solely because the family is over the income limit for public housing, if the family has a valid contract for participation in an Family Self Sufficiency (FSS) program under 24 CFR part 984. Additionally, PHCD may not evict a family for being over the income limit for public housing if the family currently receives the earned income disallowance provided by 42 U.S.C. § 1437a(d) and 24 CFR § 960.255.</u>
17	ACOP, Chapter IV, (E), page 55	n/a	n/a	Deleted restriction that did not allow repayment agreements in some situations.	If it is in the best interest of the County, PHCD has the discretion to enter into repayment agreements with residents for amounts owed to PHCD. Notwithstanding the ability to enter in a repayment agreement, no such agreements are permitted if the participant intentionally engaged in activities which ultimately led to the debt	If it is in the best interest of the County, PHCD has the discretion to enter into repayment agreements with residents for amounts owed to PHCD.