



## FY2018-19 Administrative Plan Revision Summary

**Indicates policy has been added**

**~~Indicates policy has been removed~~**

### Reason for the Change to 4.3.C - Selection Method

This policy was updated to begin preference and pre-eligibility determination prior to a full eligibility appointment.

#### 4.3.C SELECTION METHOD

(1) SAHA must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that SAHA will use [982.202(d)].

(2) **Local Preferences [24 CFR 982.207; HCV p. 4-16]**

(a) SAHA is permitted to establish local preferences, and to give priority to serving families that meet those criteria.

(b) HUD specifically authorizes and places restrictions on certain types of local preferences.

(c) HUD also permits SAHA to establish other local preferences, at its discretion.

(d) Any local preferences established must be consistent with SAHA's plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

(e) Preferences **may be verified prior to selection but must be verified by will be verified at the** time of selection from the waiting list. If a selected preference cannot be verified by SAHA at the time the applicant is selected from the waiting list, the applicant will be returned to the waiting list in the order he or she would have been ranked had the preference not been selected.

(f) **Waiting List Preferences**

SAHA'S waiting list preferences are defined below and shall be assigned points as indicated. SAHA will accept applications from preference applicants even when the waiting list may otherwise be closed. Applicants who qualify for a preference will not be required to



complete the online registration but will be placed directly on the waiting list in order of total combined preference points.

- (i) **Homeless Referrals (100 Points)** – Families certified by a designated social service agency as homeless and referred to SAHA under the terms and conditions of a Memorandum of Agreement with the certifying social service agency, such as Haven for Hope, San Antonio Metropolitan Ministries, and the Center for Health Care Services.
- (ii) **5-Year Mainstream Participants (75 Points)** – The first 100 applicants on the tenant-based voucher waiting list who have a household member at least 18 years or older with a disability.
- (iii) **SAHA Program Displacement (70 Points)** –
  - (A) Participants in “good standing” at a SAHA public housing community or a SAHA housing assistance program who will be displaced through no fault of their own; or
  - (B) Participants in the Project-Based Voucher program who require an emergency transfer through Violence Against Women Reauthorization Act of 2013 procedures [24 CFR 983.261].
- (iv) **Public Housing Demolition/Disposition (50 Points)** – Residents in “good standing” at a SAHA public housing community on the date the community was approved by HUD to be disposed or demolished.
- (v) **Voucher Program Return (40 Points)** – Former participants under the tenant based Housing Choice Voucher Program whose assistance was terminated because SAHA did not have sufficient federal funding to continue to provide rental assistance.

### Reason for the Change to 4.3.D - Notification of Selection

This policy was updated to incorporate the new process of accepting eligibility documentation through mail to begin preference and pre-eligibility determination prior to a full eligibility appointment.

This change also allows SAHA to remove a family from the waitlist if their address is not current, as SAHA requires, and the notification letter is returned to SAHA via the post office.

### 4.3.D NOTIFICATION OF SELECTION



- (1) When a family has been selected from the waiting list, SAHA must notify the family in writing [24 CFR 982.554(a)].

- (a) SAHA will notify the family by first class mail when they are selected from the waiting list. The notice will inform the family of the following:
- (i) Notification of the scheduled appointment or notification to contact SAHA for an appointment to determine eligibility or instructions to complete eligibility via mail, including any procedures for rescheduling the appointment;
  - (ii) Persons required to attend the interview or submit documents through mail;
  - (iii) Documents that must be provided to SAHA to document the legal identity of household members, including information about what constitutes acceptable documentation; and
  - (iv) Documents that must be provided to SAHA to document the legal identity of household members, including information about what constitutes acceptable documentation; and
  - (v) Other documents and information that should be submitted.
- (b) If a notification letter is returned to SAHA by the post office with no forwarding address, the family will be removed from the waiting list.
- (c) If a family wishes to remove one or more preferences from their application before their eligibility interview, the family must submit an Application Preference Removal Form to SAHA to be placed on the waiting list in the order the family would have been ranked had the preference not been selected. If the family does not submit an Application Preference Removal Form, SAHA will conduct the eligibility interview as scheduled.

### Reason for the Change to 4.3.E - Early Engagement Program

This policy was updated to establish SAHA's right to deny assistance if the family does not attend a required EEP briefing.

### 4.3.E EARLY ENGAGEMENT PROGRAM

All applicants selected from the waiting list, with the exception of elderly and disabled applicants, must attend a SAHA-sponsored Early Engagement Program (EEP) briefing before or after they are determined eligible for participation. Generally, applicants are required to attend the EEP briefing prior to voucher issuance. However, SAHA may waive this requirement and



issue a voucher to an applicant before he or she has attended the EEP briefing if doing so would remove a barrier for the family in quickly securing and/or leasing a suitable unit. Failure to attend a required EEP briefing may be cause for denial.

### Reason for the Change to 4.3.F - The Application Interview

This policy was updated to incorporate the new process of accepting eligibility documentation through mail to begin preference and pre-eligibility determination prior to a full eligibility appointment.

#### 4.3.F THE APPLICATION INTERVIEW

- (1) HUD recommends that SAHA obtain the information and documentation needed to make an eligibility determination through an interview and briefing process [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.
- (2) Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if SAHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by SAHA [Notice PIH 2012-10].

(a) SAHA will not allow an applicant family to retain its place on the waiting list if it fails to meet SSN documentation requirements at the time eligibility is determined.

- (3) Reasonable accommodation will be made for persons with disabilities or persons who require other assistance.

(4) Families selected from the waiting list are required to participate in an eligibility interview or complete an eligibility packet through mail.

(5) Family Attendance If the family is required to attend an eligibility interview, the following requirements apply:

- (a) All adult (age 18 and over) household members are required to attend the interview and full application process.
- (b) If the family is unable to attend a scheduled interview, the family should contact SAHA in advance of the interview to schedule a new appointment.



- (c) If a family does not attend a scheduled interview, the family has 10 business days to contact SAHA to schedule a second appointment.
- (d) Applicants who fail to attend both scheduled interviews will be denied assistance based on the family's failure to supply information to determine eligibility and removed from the waiting list. A denial notice will be issued in accordance with policies contained in Chapter 3.

**(6) Documentation Requirements**

- (a) **The interview Eligibility** will be conducted only if all adult family members provide appropriate documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained **or the family must provide the documents through mail or email as soon as possible.**
- (b) The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, SAHA will provide the family with a written list of items that must be submitted by a specified date.
- (c) Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status).
- (d) If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.
- (e) If the required documents and information are not provided within the required time frame, including any extensions, the family will be sent a notice of denial in accordance with the policies in Chapter 3.
- (f) If a family selected one or more preferences that SAHA cannot verify at the time of **the interview selection**, the family will be required to submit an Application Preference Removal Form to SAHA within 10 business days of the interview to be placed on the waiting list in the order the family would have been ranked had the preference not been selected (see 4.3.C).

- (7) **Interviews-Eligibility** will be conducted in English.



- (a) An advocate, interpreter, or other assistant may assist the family with the application and the interview process.
- (b) For limited English proficient (LEP) applicants, SAHA will provide translation services in accordance with SAHA's LEP guidelines.

## Reason for the Change to 6.1.C - Anticipating Annual Income

This policy was updated to clarify the date from which paystubs will be considered current.

### 6.1.C ANTICIPATING ANNUAL INCOME

- (1) SAHA is required to count all income "anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date" [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.

- (2) **Basis of Annual Income Projection**

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- (i) When EIV is obtained and the family does not dispute the EIV employer data, SAHA will use current tenant-provided documents to project annual income.
- (ii) When the tenant-provided documents are pay stubs, SAHA will make every effort to obtain the 4 current and consecutive pay stubs that reflect **some** income received by the family. **The paystubs must be dated** within the last 90 days for applicants and the last 120 days for participants **according to the most current date: (1) the date received by SAHA, or (2) the date the application was signed.** If the participant cannot provide four current pay stubs, SAHA will obtain third-party verification.
- (iii) SAHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:
  - (A) If EIV or other UIV data is not available,
  - (B) If the family disputes the accuracy of the EIV employer data, and/or
  - (C) If SAHA determines additional information is needed.
- (iv) In such cases, SAHA will review and analyze current data to anticipate annual income. In all cases, the family file will be



documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how SAHA annualized projected income.

## Reason for the Change to 6.3.D - Applying Utility Allowances

The MTW Activity regarding Simplified Utility Allowance Schedule was updated to state that tenant-provided appliances do not count as tenant-supplied or -paid utilities. This update was made to reduce confusion among participants and provide guidance for staff.

### 6.3.D APPLYING UTILITY ALLOWANCES [24 CFR 982.517]

#### (1) Overview

- (a) A SAHA-established utility allowance schedule is used in determining family share and SAHA subsidy.
- (b) The utility allowance for the family must be the lower of
  - (i) The utility allowance amount for the voucher size, or
  - (ii) The utility allowance amount for the unit size of the unit rented by the family.
- (c) **MTW Simplified Utility Allowance Schedule**

- (i) For MTW participants and new admissions, a simplified (flat) utility allowance schedule will be used to determine the monthly utility reimbursement.
- (ii) The flat utility allowance schedule is based on analysis of the HCV portfolio including the most common structure and utility types.
  - (A) The flat utility allowance schedule is based on bedroom size only with no fluctuation between some utilities being provided and all utilities being provided.
  - (B) The flat utility allowance for the family must be the lower of
    - (1) The flat utility allowance amount for the voucher size, or
    - (2) The flat utility allowance amount for the unit size of the unit rented by the family.



(C) The flat utility allowance will not be granted in the case of tenant-provided appliances, which are not considered tenant-supplied or -paid utilities.

(iii) For HCV participants who qualify for hardship exemption and who are participants of Special Programs, the existing (non-flat) utility allowance schedule still applies.

## Reason for the Change to 7.1.B - Overview of Verification Requirements

This policy was updated to reflect SAHA's practice of requesting the most current documents available.

An update was included to define when a family participating the Rent Simplification MTW Activity can submit a self-certification of assets.

### 7.1.B OVERVIEW OF VERIFICATION REQUIREMENTS

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#### (2) Requirements for Acceptable Documents

- (a) Any documents used for verification must be the original.
- (b) The documents must not be damaged, altered or in any way illegible.
- (c) Any documents used for verification must be dated within 60 days for applicants and 120 days for participants according to the most current date: (1) the date received by SAHA, or (2) the date the application was signed. .
- (d) SAHA will accept documents dated up to 6 months before the effective date of the family's reexamination if the document represents the most recent scheduled report from a source. For example, if the holder of a pension annuity provides semi-annual reports, SAHA would accept the most recent report.
- (e) Printouts from employer websites are considered original documents.
- (f) Any family self-certifications must be made in a format acceptable to SAHA and must be signed in the presence of a notary public (e.g., an affidavit).

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#### (6) When Third-Party Verification is Not Required [Notice PIH 2010-19]

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(d) **Value of Assets and Asset Income [24 CFR 982.516(a)]**

- (i) For families with net assets totaling \$5,000 or less, SAHA may accept the family's declaration of asset value and anticipated asset income.
- (ii) However, SAHA is required to obtain third-party verification of all assets regardless of the amount during the intake process and at least every three years thereafter.

- (iii) For families with net assets totaling \$5,000 or less, SAHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable.
- (iv) The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration.
- (v) SAHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every three years thereafter.

- (vi) SAHA will accept the family's self-certification of the value of family assets and anticipated asset income for net assets totaling \$25,000 or less.
- (vii) Third-party verification is still required for assets totaling a value more than \$25,000.

**Reason for the Change to 7.2.A - Verification of Legal Identity**

This policy was updated to ensure SAHA receives proper photo identification to verify legal identity. If a valid (non-expired) State-issued ID cannot be provided, SAHA must receive another form of photo identification.

**7.2.A VERIFICATION OF LEGAL IDENTITY**

- (1) SAHA will require families to furnish verification of legal identity for each household member.
- (2) Verification of legal identity for adults must include a valid State-issued driver's license or State-issued identification card.
- (3) If valid State-issued driver's license or identification card is not available, verification of legal identity for adults must include a photo identification and one of the following:



- (a) Certificate of birth (Birth Facts do not qualify);
  - (b) Naturalization papers;
  - (c) Church-issued baptismal certificate;
  - ~~(d) Valid State-Issued driver's license or State-issued identification card;~~
  - (e) U.S. military discharge paperwork (DD 214);
  - (f) U.S. passport; or
  - (g) Employer identification card.
- (4) Verification of legal identity for children must include one of the following:
- (a) Certificate of birth (Birth Facts do not qualify);
  - (b) Adoption papers;
  - (c) Custody agreement;
  - (d) Health and Human Services ID; or
  - (e) School records.
- (5) If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.
- (6) If none of these documents can be provided and at SAHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to SAHA and be signed in the presence of a SAHA representative or notary public (e.g., an affidavit).
- (7) Legal identity will be verified on an as-needed basis.

### **Reason for the Change to 8.1.B - Clarification of HUD Requirements**

Housing Quality Standards for Exteriors were updated to ensure the unit/property meets quality standards that benefit the tenant, landlord and SAHA Inspectors.

#### **8.1.B ADDITIONAL LOCAL REQUIREMENTS**

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##### **(6) Clarifications of HUD Requirements**

SAHA must define a "healthy living environment" for the local climate. This may be done by establishing a temperature that the heating system must be capable of maintaining, that is appropriate for the local climate.



As permitted by HUD, SAHA has adopted the following specific requirements that elaborate on HUD standards:

(a) **Walls**

Plaster or drywall must be repaired or replaced in areas where it is sagging, severely cracked or otherwise damaged.

(b) **Windows**

(i) Window sashes must be:

(A) In good condition;

(B) Solid and intact; and

(C) Replaced when damaged or deteriorated.

(ii) Windows must be weather-stripped as needed to ensure a watertight seal.

(iii) Window screens, if present, must be in good condition.

(iv) Plexi-glass is not an acceptable glazing replacement.

(c) **Doors**

All exterior doors must:

(i) Be weather-tight to avoid air or water infiltration;

(ii) Be lockable;

(iii) Have no holes;

(iv) Have all trim intact; and

(v) Have a threshold.

(d) **Floors**

(i) All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be resecured and made level. If they cannot be leveled, they must be replaced.

(ii) All floors must be in a finished state. Plywood is not acceptable.

(e) **Water Heating & Appliances**

Hot water must be available at all times at a temperature between 95 degrees and 120 degrees Fahrenheit.

(i) Owners of units in non-compliance with this requirement will be given five business days to make the necessary repairs.



- (ii) Units found with inoperable stoves and/or refrigerators will be given five business days to make the necessary repairs.

**(f) Bathrooms**

- (i) All bathrooms must have an openable window or exterior exhaust system.
- (ii) If a bathroom does not have an openable window or exterior exhaust, SAHA may permit a ductless ventilation system that prevents the accumulation of unhealthful odors and sewer gases.

**(g) Security**

If window security bars or security screens are present on emergency exit window, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

**(h) Bedrooms**

- (i) Bedrooms in basements, attics or converted garages are not allowed unless the owner provides SAHA documentation from a licensed professional such as a licensed general contractor, building official, engineer or city inspector verifying that the room contains no safety hazards, or a Bexar County Appraisal District (Bexar CAD) print-out with the number of bedrooms for the unit.
- (ii) Minimum bedroom size is a 70 square foot area.

**(i) Smoke Detectors**

- (i) Smoke detectors are required in:
  - (A) Each bedroom and
  - (B) Adjacent hallways on each floor level.
- (ii) If no hallway exists, a smoke detector must also be placed outside each bedroom.

**(j) Exteriors**

- (i) Mailboxes must be functional and operable.
- (ii) The **property unit** address must be:
  - (A) Visible from the street with a minimum requirement size of;
  - (B) At least 3 inches tall;
  - (C) In a color that contrasts with the background; and



(D) For multi-family units, individual unit numbers must be present and visible.

(iii) All trash containers must have a cover or attached lid capable of sealing in refuse and trash.

(k) **Utilities**

Units that share utility meters are not acceptable, unless:

(i) The owner installs separate utility meters for each unit and service, or

(ii) The residential lease specifies that the unit is an “all bills paid” unit.

(iii) Utilities are allocated in accordance with state and local law.

### Reason for the Change to 8.2.C - Biennial Inspections

All policy regarding the Landlord Excellence Program was removed as SAHA no longer offers the program.

Biennial inspections were offered as an incentive to participate in the Landlord Excellence Program, but dissolved as an incentive along with the program. It was decided that biennial inspections could be offered to any landlord whose unit passes on the first inspection. This will decrease the work burden on Inspectors and support SAHA’s relationships with landlords in good standing.

### 8.2.C ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405; 982.406]

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(2) **Biennial HQS Inspections [FR 06/25/14; Notice 2016-05]**

(a) SAHA may adopt biennial inspections.

(b) SAHA may not use biennial inspections in lieu of an initial inspection or interim inspection such as special inspections and quality control inspections.

(c) SAHA may conduct an inspection at an earlier date than the two-year anniversary of the last inspection.

(d) Units that successfully pass an HQS inspection on the first inspection will be eligible for a biennial inspection.



**(d) Landlord Excellence Program**

SAHA's Assisted Housing Programs has implemented the Landlord Certification Program, which will certify landlords in Housing Choice Voucher policies and procedures.

See *Landlord Certification Fact Sheet* located on [www.saha.org](http://www.saha.org) for more information.

- (i) Once certified, a landlord whose unit successfully passes an HQS inspection on the first inspection will be eligible for a biennial inspection.
- (ii) If a unit fails to pass on first inspection, the biennial inspection incentive is forfeited.
- (iii) Landlords will not lose their certification as a result of a failed inspection.

**Reason for the Change to 8.2.F - No Entry**

According to 24 CFR 982.405(g), the PHA must inspect the unit within 24 hours of receiving notification of a life-threatening condition. If the Inspector is unable to gain entry to the unit to confirm the life-threatening condition has been resolved, responsibility falls to the tenant and the unit will final fail. Instruction was added to the policy regarding no-entry to indicate that the tenant's presence is required to complete an emergency inspection.

**8.2.F INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT**

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**(6) No Entry**

- (a) If SAHA is unable to gain entry to the unit in order to conduct the scheduled inspection, SAHA will reschedule the inspection within 10 business days.
- (b) SAHA will allow for only one no entry. Two inspections resulting in a no entry may result in termination of housing assistance.
- (c) The above policy does not apply to 24-hour follow-up inspections for life-threatening conditions. Tenants will not receive a no entry allowance for an emergency inspection.



## Reason for the Change to 10.1.B - Denial of Moves

This policy change was made to provide clear guidance for SAHA staff as the following CFRs provide contradictory instructions on when to allow a family to move.

1. CFR 982.354 states that "A family may move to a new unit if: (2) The owner has given the tenant a notice to vacate, or has obtained a court judgement or other process allowing the owner to evict the tenant."
2. However, CFR 982.552 states that "The PHA must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease."

### 10.1.B RESTRICTIONS ON MOVES

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#### (3) Denial of Moves

HUD regulations permit SAHA to deny a family permission to move under the following conditions:

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#### (b) *Grounds for Denial or Termination of Assistance*

SAHA has grounds for denying or terminating the family's assistance [24 CFR 982.354(e)(2)].

- (i) VAWA creates an exception to these restrictions for families who are otherwise in compliance with program obligations, but have moved to protect the health or safety of an individual who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and who reasonably believed he or she was imminently threatened by harm from further violence if they remained in the unit. [Pub.L. 109-162].

(ii) SAHA will deny the family permission to move in the following circumstances:

- (A) If SAHA has mailed the participant a Notice of Intent to Terminate Program Assistance;
- (B) If the participant has vacated the unit in violation of the lease; and
- (C) If the participant has been evicted from the unit.



(iii) If SAHA has grounds for denying or terminating a family's assistance, SAHA will act on those grounds in accordance with the regulations and policies set forth in Chapters 3 and 12, respectively. SAHA may deny a family permission to move for this reason.

~~(iii) If the participant has vacated the unit in violation of the lease, SAHA will deny the family permission to move.~~

### **Reason for the Change to 13.1.C - Correct HQS Deficiencies Within the Period Specified by SAHA**

This policy was updated because SAHA no longer sends inspection results to the landlord via mail. Inspection results are made available to the landlord through the Landlord Corner. Landlords are currently notified by phone of inspections that must be performed within a short time frame (24-hour, 3-business-day and 5-business-day inspections).

5-business-day inspections are currently utilized (for items such as appliances) but were not previously addressed in policy.

#### **13.1.C OWNER RESPONSIBILITIES [24 CFR 982.452]**

The owner responsibilities in the HCV program are outlined in the regulations, HAP Contract (Form HUD-52641), and Tenancy Addendum (Form HUD 52641-A), as follows:

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#### **(3) Maintenance and Housing Quality Standards (HQS)**

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##### **(b) Correct HQS Deficiencies Within the Period Specified by SAHA**

(i) SAHA must not make any housing assistance payments if the contract unit does not meet HQS requirements, unless the owner corrects the defect within the period specified by SAHA and SAHA verifies the correction.

~~(ii) When SAHA identifies HQS deficiencies that are not life threatening, or classified as a 3-business-day or 5-business-day inspection, SAHA will not send the owner and the family a written notification of the inspection results. within 5 business days of the inspection. The written notice will specify the time frame within which the failure must be corrected.~~



(iii) Generally, not more than 30 days will be allowed for the correction.