

Chapter 1 - Statement of Policies and Objectives

1. Updates the Mission Statement of the Community Development Commission to:
“Opening doors to permanent housing”
2. Updates the policy for requesting a Reasonable Accommodation to:
 - a. Clarify who is eligible to request a reasonable accommodation;
 - b. Expand the group of individuals who are eligible verify a disability related need;
 - c. Delete the requirement that a medical professional must provide written verification of a disability related need
3. Updates the policy related to individuals with Limited English Proficiency (LEP) to:
 - a. Clarify that if a client prefers, they may provide their own interpreter, but that the interpreter must be 18 years of age or older;
 - b. Clarify that the Housing Authority will translate vital program documents into the language needed by a participating LEP family
4. Updates the Owner Outreach Policy to remove the specificity of organizations the Housing Authority participates in.

Chapter 2 - Eligibility for Admission

- Expands the group of individuals eligible to verify a disability related need for a Live-In Aide
- Clarifies documentation requirements for a Live-In Aide

Chapter 3 - Applying for Admission

Note: This Chapter contains substantive amendments.

1. Updates to the Preliminary Application and Full Application Taking Process include:
 - a. Substantially amends the waitlist application process to reflect that during times of an open waitlist, the waitlist will be generated via random lottery without regard to preferences from the preliminary applications received.
 - b. Identifies alternate means of application submission which may be utilized by the Housing Authority
 - c. Identifies that the Housing Authority may opt to limit the number of applicants placed on the waitlist to correspond to the number that may reasonably be expected to be reached within one year.
2. Updates to the Opening/Closing of the Waitlist include:
 - a. Updates the public noticing process to include the Press Democrat, minority media outlets, and the Community Development Commission website

- b. Removes specificity of advertising through various newspapers, radio stations, and non-profits
 - c. Clarifies public notification process for closing of waitlist
 - d. Eliminates “Limits on Who May Apply” section
- 3. Replaces “Initial” Application Procedure section with a “How to Apply” section.
 - a. Provides new policy for format and contents of preliminary applications
 - b. Provides new methods by which the Housing Authority may choose to accept preliminary applications
 - c. Provides that the Housing Authority will grant special accommodation requests for submission of preliminary applications without verifying applicant’s disability
 - d. Provides that the Housing Authority must remove an applicant from any other assisted housing programs before providing rental assistance through the Housing Choice Voucher program
- 4. Adds “Waitlist Structure” section
 - a. Provides that applicants will be selected for placement on the waitlist via random lottery after the close of the preliminary application period
 - b. Provides that applicants not selected for placement on the waitlist will be notified as soon as reasonably possible and that their preliminary application is no longer active
- 5. Modifies “Applicant Status While on Waitlist” section to:
 - a. Includes that no applicant has a right or entitlement to be listed on the waitlist or to any particular position on the waitlist
- 6. Updates process for policy related to purging the Waitlist
 - a. Clarifies that requests for updated application information will be sent to the last address that the Housing Authority has on file for the applicant
 - b. Clarifies that if an applicant does not respond to a request for updated information by the deadline stated in the mailer, the applicant will be removed from the applicable waitlist
 - c. Removes language that the Housing Authority will mail an update form to applicants’ whose mail is returned with a forwarding address
 - d. Clarifies that an applicant may be removed from the waitlist for failure to respond to a request for information or due to mail returned by the Postal Service
 - e. Clarifies that the Housing Authority may only consider requests for reinstatement which are made no more than one year from of the applicant’s removal from the waitlist and the waitlist that the applicant was originally part of is still active
- 7. Adds section “Final Draw from the Waiting List”
 - a. Provides that the Housing Authority may conduct a final draw from the waitlist or draw from the waitlist as needed to maintain maximum voucher utilization
 - b. Provides that applicants not included in a final draw will cancelled from the waitlist and be notified via US Mail

8. Updates the section “Completion of a Full Application”
 - a. Adds provision for when all adult family members are unable to attend the full Housing Authority interview, only the Head of Household and spouse or co-head are required to attend. Documentation signed by all adult household members must be provided at the full interview.

Chapter 4 - Establishing Preferences and Maintaining a Waitlist

Note: This Chapter contains substantive amendments

1. Update to the “Introduction” clarifying that an applicant does not always need to be eligible for a preference in order to be eligible for assistance.
2. Updates “Waiting List” section:
 - a. Clarifies that the Housing Authority may limit the number of applicants placed on the waitlist to the number who may reasonably be expected to be reached within one year.
 - b. Adds policy that the Housing Authority will establish the waitlist according to random lottery.
 - c. Removes “date and time of application” from information maintained for each applicant.
3. Substantive amendments were made to the “Local Preferences” section
 - a. Updates the waitlist selection process to include the use of a randomly assigned applicant numbers and Housing Authority preferences.
 - b. Combines the In-Place Homeless Prevention Super Preference and the Preference for Shortfall or Loss of Rental Assistance Funding for ease of use.
 - c. Provides that preference points will be cumulative and eliminates language regarding non-cumulative points.
 - d. Eliminates a preference for veterans or surviving spouses of veterans
 - e. Eliminates preference for families with minor children.
 - f. Adds a preference for persons with disabilities who are transitioning out of a mental health care institution or other segregated settings or are at serious risk of institutionalization.
 - g. Eliminates the jurisdiction preference meaning that the Housing Authority will not consider where a person currently lives or works when determining eligibility.
 - h. Clarifies that the use of an In-Place Preference will only be applicable during times that overall program utilization is at or below 95%.
 - i. Clarifies that 20% of the Housing Authority annual turn-over vouchers may be used for the Move-On program rather than 10% of all program vouchers. On average, this equates to roughly sixty vouchers per year
 - j. Clarifies that referrals for the Re-entry Pilot Program must come from organizations who have entered into an agreement with the Sonoma County Probation Department or other law enforcement agency.

- k. Proposes to allow 45 participants to enter the Re-Entry Pilot Program over a three-year period ending December 31, 2022. At the end of this period the Housing Authority may opt to make this an ongoing program or eliminate the program depending on outcomes recorded.
- 4. Clarification added to the section “Initial Determination of Local Preferences”
 - a. Clarifies that if an applicant is drawn from the waitlist based on an indicated preference for which they do not qualify, they will be returned to the waitlist in accordance with their original waitlist position without the addition of a preference.
 - b. Adds a section “Preference Denial” and provides the process by which an applicant who has not received a preference may request an informal review.

Chapter 5 - Subsidy Standards

There are no proposed changes to this Chapter.

Chapter 6 - Factors Related to Total Tenant Payment and Family Share Determination

In addition to minor changes to wording, this Chapter includes clarification to the Medical Expense Policy.

- 1. Changes to “Medical Expenses” section include:
 - a. Provides that in order for over-the counter medications to be used as an eligible medical expense, they must be prescribed by a knowledgeable medical practitioner to treat a specific medical condition. Non-prescription medications taken to maintain general good health are not eligible medical expenses for purposes of the program.
 - b. Provides that the Housing Authority will utilize the most current IRS Publication 502, Medical and Dental Expenses, as a guide to determine allowable medical expenses when HUD regulations and Housing Authority policies are unclear.
 - c. Provides that if a participant requests the inclusion of medical mileage, that the Housing Authority will use the IRS medical mileage rate, or cab, bus fare, or other public transportation cost for verification of the cost of transportation directly related to medical treatment.
 - d. Provides that requests for medical mileage must be submitted on the Housing Authority Medical Mileage Expense form.

Chapter 7 - Verification Procedures

In addition to minor changes to wording, this chapter includes clarification to the following:

- 1. Clarifies that in addition to a medical practitioner, a social worker or other reliable third party with knowledge of a person disability related needs, may verify the

need for services of an attendant and/or auxiliary apparatus to permit the disabled individual to be employed for function substantially independently so another family member may be employed.

2. Clarifies that in addition to a medical practitioner, a social worker or other reliable third party with knowledge of a person disability may provide verification of disability.
3. Clarifies that medical expenses for dental expenses, eyeglasses, hearing aids and batteries will become eligible upon payment of expense.
4. Clarifies that for prescribed medications (prescription and non-prescription) a medical practitioner must complete a Medical Expense Form.
5. Clarifies that the Housing Authority requires documentation of scheduled payment program/plan for services the participant is making regular payments on.
6. Provides that the Housing Authority will allow medical mileage for transportation costs to and from required medical appointments using the IRS medical mileage rate.
7. Clarifies that the Housing Authority will not allow a medical expense deduction for food items (i.e. Ensure, organic foods).

Chapter 8 - Voucher Issuance and Briefings

In addition to changes in wording, this Chapter includes the following changes:

1. Provides that only the Head of Household is required to attend the full program Briefing.
2. Clarifies that the available unit listing will include accessibility features of units which have been reported by the property manager/owner.
3. Includes a statement that the Housing Authority will encourage participant families to search for housing in areas outside of minority or poverty concentration.
4. Deletes statements that the Housing Authority provides housing search assistance to families or has a Housing Search Workshop for families to assist then in locating a unit.

Chapter 9 - Request for Tenancy Approval and Contract Execution

1. Changes include minor language clean-up
2. Clarifies that in order to be an eligible housing type, a residential structure must be on a fixed foundation and permanently connected to utility services.
3. Updates the list of Housing Authority staff who are authorized to sign a Housing Assistance Payment contract for a specific unit.
4. Clarifies that the Housing Authority may not approve a tenant to rent a unit when the landlord and tenant are related by blood or marriage.

Chapter 10 - Housing Quality Standards and Inspections

1. Changes include minor language clean-up

2. Deletes old language related to quality control inspections and updates to indicate that these inspections will be performed by an individual who did not conduct the initial inspection
3. Clarifies that quality control inspections will be conducted throughout the year

Chapter 11 - Owner Rents, Rent Reasonableness, and Payment Standards

1. Updated method by which the Housing Authority tracks payments to owners/property managers
2. Updated to encourage Owners and Property Managers to utilize direct deposit for Housing Assistance Payments

Chapter 12 - Recertifications

1. Clarifies that families need only report eligible immigration status at annual recertification when there is a change or addition to the household
2. Clarifies that only the head of household is required to attend annual recertification appointments so long as they bring all of the required documents signed by all adult household members to the appointment

Chapter 13 - Moves with Continued Assistance

1. Includes general changes to wording
2. Removes language that a contract for a new unit may begin with five days of move from old unit. This language change is being made to provide families additional flexibility when switching units.
3. Clarifies that the Housing Authority may pay Housing Assistance Payments (HAP) through the end of the month that a family moves out. This change will allow an increased overlap time to provide families additional flexibility when switching units.
4. Includes co-head as an individual for whom consideration may be made for portability requests.
5. Includes language that portability requests which would otherwise be ineligible may be granted as a reasonable accommodation.

Chapter 14 - Contract Terminations

1. Provides that the Housing Authority may pay contract rent through the end of the month in which a Housing Assistance Payment contract terminates if funding is available.
2. Includes general language changes

Chapter 15 - Denial or Termination of Assistance

1. Updates mandatory denial policy related to life-time sex offender registrants to conform with Federal requirements
2. Updates the mandatory denial policy related to production of methamphetamine in federally assisted housing in conformance with Federal requirements

3. Updates the mandatory denial policy related to eviction from federally assisted housing to delete “for serious or repeated lease violations” and include “for drug-related criminal activity.” This change conforms local policy to Federal requirements.
4. Clarifies that persons evicted from federally assisted housing for drug-related criminal activity may be admitted to the program subject to informal review procedures.
5. Changes denial language from “commits” to “convicted” in relation to drug-related or violent criminal activity

Chapter 16 - Owner Disapproval and Restrictions

1. Clarifies that the Housing Authority will not approve a participant to rent a unit when the participant is related to the owner by either blood or marriage.

Chapter 17 - Veterans Affairs Supportive Housing

There are no proposed changes to this Chapter.

Chapter 18 - Owner or Family Debts to the Housing Authority

1. Changes include some minor language changes
2. Clarifies that when a family is subject to a Repayment agreement, the family’s payment history will be considered as part of the authorization to move process
3. Adds a provision related to personal checks returned by the banking institution for insufficient funds. After two checks returned for non-sufficient funds, the family will be required to make payments on repayment agreements in an alternate form such as cash, money order, or cashier’s check.
4. Provides that the Housing Authority may, under certain circumstances, allow a family who failed to report an increase in income to enter into a repayment agreement

Chapter 19 - Complaints and Appeals

1. Changes include some minor language changes
2. Provides that at the discretion of the Housing Authority, an extension to the time to request an informal review may be made.
3. Clarifies that informal hearing decisions will be mailed to the participant by the Housing Authority

Chapter 20 - Special Housing Types

1. Updates approved special housing types to include Congregate Housing
2. Incorporates general information, payment standard, utility allowance, and Housing Assistance Payment calculation information, and Housing Quality Standards for Congregate Housing.

3. Discontinues the Homeownership Program, but provides that program requirements will continue to be applicable to households on the Housing Authority's Homeownership Program prior to June 4, 2019

Chapter 21 - Project Based Voucher (PBV) Program

Note: This Chapter contains substantive changes

1. Provides that with HUD's approval an additional 10% (above and beyond regulatory limit) of the Housing Authority's Annual Contributions Contract (ACC) units may be made available under the Project Based Voucher program for units which are exclusively available to families eligible for supportive services or units exclusively available to elderly families.
2. Updates regulatory guidance references
3. Updates advertising process to include the Housing Authority website and reduces number of publications in the newspaper to one.
4. Clarifies project eligibility for the award of PBVs on a non-competitive basis to 9% low-income housing tax credits (LIHTC) or other comparable LIHTC
5. Updates the number of proposed number of units within a project which can be project-based to include a glossary reference and to remove single family dwellings
6. Provides that in the proposal ranking process, additional points will be granted to projects which are outside areas of minority concentration and areas of concentrated publicly supported housing
7. Clarifies requirement for environmental clearance for existing housing projects
8. Imposes a requirement that owners of existing housing who are seeking project based vouchers have an accessibility survey completed for the property
9. Updates factors for selecting applications to include that units are located outside areas of minority concentration, that the design exceeds ADA accessible units requirements, and that the design meets the design and construction requirements outlined in 24 CFR § 100.205
10. Provides that the Housing Authority will centrally maintain project-specific waitlists for developments with Project Based Vouchers
11. Provides that placement on the Project Based Voucher waitlist will be according to a randomly assigned tenant ID number.
12. Provides that applicants requiring accessible units will be referred for accessible units in the order of their randomly assigned applicant ID number before applicants who do not require the features.
13. Provides that there are vacant or turnover units specified for a specific population (i.e. disabled or elderly) and there are no applicants on the PBV waitlist needing that type of unit, the Housing Authority may draw names from its Section 8 waitlist.
14. Provides that when the HCV and PBV waitlists are open simultaneously, the Housing Authority must ensure that applications for all open waitlists are made available.

15. Provides that if a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waitlist or any other PBV waitlists. Rejection by the PBV owner, however, shall be grounds for removal from the PBV site-based waitlist.
16. Provides that upon request, the owner shall provide the Housing Authority with the basis for which an applicant was denied admission.

Glossary

1. Clarifies the definition of "Project" as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. Single family homes, duplexes, triplexes, and fourplexes may constitute a project.