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1	1.3 Housing Authority Overview	In addition to these vouchers the AHD also administers the Family Self-Sufficiency (FSS) program to assist approximately 37 families. With the assistance of FSS coordinators, each FSS family works toward the attainment of a person five-year written plan to move from dependency to self-reliance. The Division also assists eligible qualifying families to pursue the dream of home ownership through the Section 8 Homeownership option.	Delete the entire paragraph from the City Administrative Plan "ONLY." The City does NOT have an FSS Program.	No	Clarification	No	The City does not have an FSS Program.
2	2.2 Opening and Closing of Interest List	There is currently a separate interest/wait list for the City Program and the County Program; however, applicants can lease up in either jurisdiction. Technically, the City of Fresno is within jurisdiction of Fresno County. There is a great % of voucher holders who are leased within the City limits.	Single Interest/Waiting List. FH uses the same applicants for its City and County Housing Choice Voucher programs. The use of a single interest/waiting list will reduce burden and avoid confusion for applicants in the process of applying for HCV assistance. Managing a single interest/waiting list also reduces administrative burden by allowing staff to perform other application functions, such as issuing vouchers more expeditiously. Selected applicants who meet eligibility requirements will be issued a voucher and may lease up in either the city or county of Fresno regardless of receiving a City or County HCV voucher.	Yes	HUD Discretionary Change	Yes	<u>982.205 Waiting List: Different Programs.</u> (a) Merger and cross-listing. (1) Merged waiting list. A PHA may merge the waiting list for tenant-based assistance with the PHA waiting list for admission to another assisted housing program, including a federal or local program. In admission from the merged waiting list, admission for each federal program is subject to federal regulations and requirements for the particular program. <u>PIH Notice 2020-02</u> addresses Guidance on Shared Waiting Lists, and HUD's requirement to publish procedural guidance for implementing shared waiting lists. Amongst the list of <i>Best candidates for a shared waiting list is,</i> " PHAs and owners that receive applications from similar applicants; PHAs that share a geographic area of jurisdiction, and PHAs in densely populated, urban areas where there may be many smaller PHAs with overlapping service areas, or places where there is a county-wide PHA whose service area also encompasses smaller town or city-level PHAs. HUD also noted that there may also be other programs/characteristics that could lend entities to be good candidates for shared waiting lists.
2	2.2 Opening and Closing of Interest List	There is currently no verbiage about Site-Based PBV or Referral-Based Public Notices	Site-based Project-Based Vouchers (PBV). When FH opens a site-based interest/waiting list for PBV units, all new applicants and families or individuals currently on FH's tenant-based interest/waiting list will be provided with the option to have their names placed on the list as well. As described in Notice PIH 2011-54, <i>Guidance on the Project-Based Voucher Program</i> , PHAs do not have to notify each family on the tenant-based waiting list by individual notice. FH will notify these applicants by the same means it would use in opening its interest list. Referral-based PBVs. FH accepts applications by direct referral for project-based units specifically designated for persons experiencing homelessness, chronic homelessness or at risk of chronic homelessness, and/or persons with severe mental illness by direct referral from the Coordinated Entry System (CES) managed by the Fresno Madera Continuum of Care (FMCoC) or other community partners for specific projects. The Public Notice will clearly state that referrals must come from CES or other sources when applicable	Yes	HUD Discretionary Change	Yes	Staff had met with HUD staff in April of 2021 regarding PBVs with NPLH and CES Referrals to get clarification on Public Notice requirements. As described in PIH 2011-54, to avoid confusion amongst applicants, PHAs do not have to notify each family on the tenant-based waiting list by individual notice.

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2	2.9.1 Purging the Waiting Lists	Purging the Waiting Lists	Add "Interest" before every entry of "Waiting" For example, "Interest/Waiting". Also update the TOC to read, "Purging the Interest/Waiting Lists."	No	Clarification	Yes	HCV implemented its option to use the Save My Spot feature during the pandemic to maintain an up-to-date interest list. "Interest List" needed to be added before the word "Waiting List" to clarify that a purge can also be performed on an Interest List. The Save My Spot feature is mentioned in the same section of the Admin Plan.
2	2.9.1 Purging the Waiting Lists	Applicants on multiple HCV interest/waiting lists. Currently there is no efficient method for applicants who successfully lease up to remove their pre-application from another HCV interest/waiting list.	Add the following: APPLICANTS ON MULTIPLE HCV INTEREST/WAITING LISTS In order to eliminate duplicate processing of pre-applications for applicants who applied on both the City and County HCV lists, applicants are given the choice to remove their pre-application from the list from which they were not selected if they were successfully leased up in the other HCV program. [Note: must adopt in the event a Single Interest/Waiting List is approved, as FH is still working with both HCV City and County Interest Lists].	No	Agency Policy Preference	Yes	When an applicant successfully leases up in an HCV program, and has another pre-application for the other HCV program; FH must perform additional draws to account for the high volume of applicants who do not respond because they are already receiving housing assistance.
3	3.4 Local Preferences	LOCAL PREFERENCES: If upon verification, FH determines that the family does not qualify for the preference(s) claimed their pre-application will be removed from the waiting list and canceled.	RETURNING TO WAITLIST: "If upon verification, FH determines that the family does not qualify for the preference(s) claimed, the preference(s) will be removed. – If there is an interest list, the applicant will be returned to the interest list without the benefit of the preference removed. – If an applicant is selected from the interest list for a specified number of preference points and the applicant does not qualify for the preference claimed, but is determined to be eligible for other preference points, the applicant will be screened for eligibility if the preference points are equal to or more than the preference points drawn. – If the applicant was in the last batch of waitlist draws (due to a final draw, for example) for a specified number of points, and the applicant's preference points are less than the specified number of points drawn, the applicant will be cancelled.	No	Clarification	Yes	Provides additional instruction as to when there is an interest that is still active and when an interest list no longer exists, what happens when an applicant does not qualify for the preferences claimed on their pre-application.
3	3.4 Local Preferences, Number 3.	LOCAL PREFERENCES: 3. Elderly or Disabled Person Preference (10 Points) "A disabled person preference applies if the head, spouse or co-head are one or more of the following:"	Disabled Person Preference (10 Points): A disabled person preference applies if head, spouse or co-head are any family member is one or more of the following:	Yes	Agency Policy Preference	Yes	Note: The disability status of every member on the pre-application is captured; therefore, families can update that information for any household member with a disability.
	3.4 Local Preferences, Number 4.	FH currently does not have a Family Preference.	Families with Minor Children Preference (# Points): Applicant families with minor children under age 18 who meet HUD and FH's definition of a family member. Minor children of a live-in aide do not qualify the family for this preference. Minor foster children of an authorized adult member of the applicant household do not qualify the family for this preference.	Yes	HUD Discretionary Change	Yes	

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4	4.4.4 Live-in Aide	Currently, there is no language in the Administrative Plan regarding the length of time a family has to identify a live-in aide. This creates a situation in which the FH pays excess HAP for a higher voucher size in the absence of a LIA.	<p>HOW MUCH TIME ALLOWED TO ADD A NEW LIVE IN AIDE: Once a live-in aide is approved, the family must identify a person as the live-in aide within 30 calendar days of the approval to allow FH to conduct a background check. Thirty-day extensions may be granted up to 120 days to allow the family time to identify a live-in aide. In the event a live-in aide cannot be identified the voucher size may be reduced by processing a special recertification. If the family later identifies a live-in aide, a special recertification may be processed which may change the anniversary date of the family's annual recertification. The same allotment of time also applies when the family must replace a current live-in aide.]</p> <p>Chapter 5 already states that "FH will not approve an unidentified live-in aid; nor a larger unit than the family qualifies for under FH subsidy standards, for an unidentified aide," but does not state the length of time the family has to identify the LIA. This addition clarifies what is already in practice.</p>	No	Clarification	Yes	Currently, there is no language in the Administrative Plan regarding the length of time a family has to identify a live-in aide. This creates a situation in which the FH pays excess HAP for a higher voucher size in the absence of a LIA.
4	4.20.3	Grievance Rights When FH Decision is to Deny Admission. VAWA documentation (Forms 5380 and 5382)	When a client is denied admission for any reason, we provide VAWA forms 5380 and 5382 with their denial paperwork (adding as clarification since this wasn't explicitly listed in original plan).	No	Clarification	No	Currently, there is no language in the Administrative Plan regarding VAWA forms 5380 and 5382 with their denial paperwork. Adding to clarify instructions and information.
5	5.2 Subsidy/Voucher Size	The subsidy standard chart current shows that a voucher is issued as two persons per bedroom.	Insert the following to the list of bullets: "A separate bedroom will be issued to the head of household (with spouse or co-head, if any) and one bedroom to every two persons, thereafter." and update the chart to reflect the new policy.	No	Agency Policy Preference	No	Due to a number of factors, which included a recent rent burden analysis and subsidy standard assessment used to examine a policy change impact on the housing assistance financial budgets, it was decided to adopt a new subsidy standard policy to support families experiencing high rent burdens and difficulties locating affordable housing.
5	5.3 Exceptions to the Subsidy Standards	Exceptions to the Subsidy Standards	Change sleeping rooms to sleeping areas.	No	Clarification	No	To align with correct Housing Quality Standard terms.
5	5.3 Exceptions to the Subsidy Standards	Exceptions to the Subsidy Standards. This section does not include language for reasonable accommodation requests for larger subsidy sizes when a household member needs a separate bedroom.	<p>Insert the following to the list of bullets: "An exception may be granted, (cases are decided on a case-by-case basis), when a member or members of the household need a separate bedroom. When considering the necessity of a larger subsidy for a separate bedroom, all other living and sleeping areas in the unit must be insufficient for use as a sleeping area.</p> <p>When the need for a separate bedroom is verified by a professional as a request for reasonable accommodation, FH will acknowledge the need for a separate bedroom for the person with disabilities and a larger subsidy may be granted when the other sleeping areas in the unit are insufficient and create an over-crowded situation (refer to Section 5.6 HQS Guidelines for Unit Size Selected).</p>	Yes	HUD Discretionary Change	Yes	NOTE: Review 24 CFR 982.402 (b) (8) and review with the local Fair Housing Agency. Also consider if this needs to be in Section 5.3.1

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5	5.4.2 Changes for Participants	The members of the family residing in the unit must be approved by FH. The family must obtain approval of any additional family member before the new member occupies the unit except for additions by birth, adoption, or court-awarded custody, in which case the family must inform FH within 10 business days.	The members of the family residing in the unit must be approved by FH. The family must obtain approval of any additional family member before the new member occupies the unit except for additions by birth, adoption, or court-awarded custody, in which case the family must inform FH within 30 business days.	No	Clarification	Yes	change 10 days to 30 days
7	7.3.1, 7.3.2, 7.9.8, 12.5.1	FH will allow 10 business days for the return of written third-party verification form before going to the next method, which is oral verification.	FH will allow 10 business calendar days for the return of written third-party verification form before going to the next method, which is oral verification.	No	Agency Policy Preference	Yes	10 calendar days will allow staff to process annual/interim reexaminations/certification more expediently, and notify residents sooner of new tenant rent portions.
7	7.3.4	EIV Discrepancies	EIV or IVT Discrepancies	No	Clarification	No	
8	8.5.2	Current policy does not clearly identify that VAWA is an extenuating circumstance which we will accept.	Adding additional language clarifying that VAWA is an extenuating circumstance which we will accept (adding as clarification since this wasn't explicitly listed in original plan).	No	Clarification	No	Adding as clarification since this wasn't explicitly listed in original plan.
11	11.5.2 When the Payment Standard Decreases	When the Payment Standard Decreases based on a reduction in the FMR when the payment standard would fall out of the basic FMR range (90 - 110%): Current policy requires FH to use the lower payment standard to calculate the family's rent portion and the owner's HAP beginning on the effective date of the family's second regular (annual) reexamination following the effective date of the decrease in the payment standard, if the amount on the PHA's payment standard schedule decreased during the term of the HAP contract.	The Housing Opportunity Through Modernization Act (HOTMA) of 2016 amended the voucher program regulations at 24 CFR 982.505(c)(3) to reflect the changes made by HOTMA. FH will use the following policy for applying a decrease in the payment standard amount to families under HAP contract on the effective date of the decrease in the payment standard amount. Hold Harmless – no reduction in subsidy. FH will continue to use the existing higher payment standard for the family's subsidy calculation for as long as the family continues to receive the voucher assistance in that unit. If a family's voucher size is reduced, any lowered payment standard will be applied at the first regular (annual) reexamination following the subsidy standard change. This rule applies whether the family's voucher size was reduced due to a change in family composition or due to the PHA changing its subsidy standards (24 CFR 982.505 (c)(3)).	Yes	HUD Discretionary Change	Yes	Effective July 29, 2016, PHAs may choose, but are no longer required, to reduce the payment standard for a family that remains under HAP contract at the family's second annual reexamination if, as the result of a decrease in the FMR, the payment standard would otherwise fall outside the basic range (90 - 110%). [FH applied for a waiver allowing us to set payment standards at 120% of FMR. A hold harmless clause is being added to avoid resetting payment standards within the 90 - 110% FMR range].
	12.7 Annual Recertification Effective Dates	In general, a decrease in family income that results in a decrease in tenants portion from an annual reexamination will take effect on the first day of the month following the date the change was reported.	In general, a decrease in family adjusted income that results in a decrease in tenants portion from an annual reexamination will take effect on the first day of the month following the date the change was reported.	No	Clarification	No	The driver that determines an earlier effective date of a recertification is when there's a loss or reduction in income, assets or expenses; not a change in payment standard, subsidy standard, or utility allowance.
12	12.9.2 New Family and Household Members Requiring Approval	With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request FH approval to add a new family member [24 CFR 982.551(h)(2)] or other household member (live-in aide or foster child) [24 CFR 982.551(h)(4)].	With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request FH approval to add a new family member [24 CFR 982.551(h)(2)] or other household member (live-in aide, foster child or foster adult) [24 CFR 982.551(h)(4)].	No	Clarification	No	added Foster Adult
12	12.11.1 Methods of Reporting	The family must notify FH of all changes in income or household composition in writing.	The family must notify FH of all changes in income or household composition in writing or by utilizing the online portal.	No	Clarification	No	All other areas related to the online portal were previously updated. It was just this sentence that was missed.

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15	15.5.2 Notice of Termination of Assistance	In any case where FH decides to terminate assistance to the family, FH must give the family written notice which states: a) The reason(s) for the proposed termination, b) The family's right, if they disagree, to request an Informal Hearing to be held before termination of assistance. c) The date by which a request for an informal hearing must be received by FH. d) Provide VAWA documentation	ADD A TIMEFRAME FOR DEADLINE TO RESPOND [AI: c) The date by which a request for an informal hearing must be received by FH, <u>which is 10 business days from the date the letter is mailed.</u>]	No	Clarification	Yes	FH has been including the date the family must request the informal hearing, however, the timeframe was not listed in the Administrative Plan. [Added the timeframe in which the family must request an informal hearing.]
19	19.4.3	Does not indicate to whom the hearing request should be addressed.	Adding language to indicate to whom the hearing request should be addressed.	No	Clarification	No	Needed further clarification.
19	19.4.4	Does not indicate when an informal hearing is occurring for terminating assistance and the family submits a VAWA claim prior to the date of the hearing, the hearing must be placed on hold for further assessment as to whether or not the termination will continue.	Adding language to indicate when an informal hearing is occurring for terminating assistance and the family submits a VAWA claim prior to the date of the hearing, the hearing must be placed on hold for further assessment as to whether or not the termination will continue.	No	Clarification	No	Needed further clarification.
22	22.11.1 Owner Proposal Selection Procedures, Method 3: Units Selected Non-Competitively	Updated the list of upcoming PBV projects	Updated the list of upcoming PBV projects	Yes	HUD Regulatory	Yes	This section must be updated annually and also included in the PHA's Annual and Five-Year Plans.
22	22.11.6 FH Notice of Owner Selection	In addition, FH will publish its notice for selection of PBV proposals <u>for two consecutive days</u> in the same newspapers and trade journals which were used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. FH will also post the notice of owner selection on its electronic web site	In addition, FH will publish its notice for selection of PBV proposals for two consecutive days, <u>or at least one day per week for at least two consecutive weeks.</u>	No	Clarification	Yes	
26	26.1 VASH Program	VETERANS AFFAIRS SUPPORTING HOUSING (VASH) PROGRAM - Income eligibility; up to 50% AMI (CA006 Only)	VETERANS AFFAIRS SUPPORTING HOUSING (VASH) PROGRAM - Income eligibility; up to 80% AMI	Yes	HUD Discretionary Change	Yes	Unlike the HCV program, income-targeting requirements (75% of applicants @ 30% AMI) do not apply for HUD-VASH families so that participating PHAs can effectively serve the eligible population, that is, homeless veterans, who may be at a variety of income levels, <u>including low-income</u> . Applying the 80% Area Median Income limits will further expand the program to serve veteran families. [Income limits are used for eligibility only at admission]. [Income-targeting is HUD's requirement that at least 75% of families admitted must be extremely low-income families]. (ELI=60% of VLI or the poverty guideline as established by DHHS); (VI=50%); (L=80%)
26	26.1	County Administrative Plan: VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH) PROGRAM	The Housing Authority of Fresno County does not have a HUD-VASH Program. The recommendation is to remove this section from the County Administrative Plan OR make a reference that the Housing Authority of Fresno County does not have a HUD-VASH Program, however, in the event vouchers are allocated, this section will be implemented.	No	Clarification	No	The Housing Authority of Fresno County does not have a HUD VASH Program.

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