

MEMO

To: Board of Commissioners
From: Karen Kreutzberg
Date: October 13, 2021
Re: **Administrative Plan Updates**

Background

The Administrative Plan for the Housing Choice Voucher Program (Admin Plan) contains the policies that explain how Boulder Housing Partners administers the Housing Choice Voucher Program. It is divided into 19 chapters and updated annually. The 19th Chapter is new for this year and contains policies for the Emergency Housing Vouchers (EHV). Revisions and changes are first presented to the Board of Commissioners and then released for public review. The public review period must be at least 45 days and provide for a public hearing as an opportunity for the public to comment. Following the public review period, public comments are reviewed for incorporation and the Admin Plan is brought back to the Board for adoption.

Given that the document is timely and subject to change, the Board's prior direction to staff about interim changes has been to bring the Board any substantive changes as they come up, and to hold administrative changes for annual approval. In our quest to make policies and rules easier to understand, there are minor wording updates and changes throughout the plan.

Analysis

Important changes to note:

1. We lowered the age at which children of the opposite sex can receive their own bedroom to age 6. This will result in an annual increase in HAP of approximately \$6,000.
2. We are allowing participants in the Family Self-Sufficiency (FSS) program the same rights under the current HUD rule, which includes retaining their voucher even if they are no longer participating in the FSS program and allowing them to move with the next available voucher after residing at Woodlands for one year. Changing these requirements will cause MTW Activity 2014-5 to be closed out. We are also allowing any housing choice voucher participant to enroll in the Family Self-Sufficiency Program if they so choose.
3. Chapter 19 is brand new and covers the Emergency Housing Vouchers that BHP was awarded in July 2021.

The following table explains the contents of each chapter and highlights the changes which fall into one of three categories:

1. Recent HUD policy changes published through Notice or Federal Regulations.
2. MTW Activity changes that were approved by the Board and HUD through the MTW Annual Plan process which must be included.
3. Clarification/changes to policies by staff.

Chapter Description	HUD required changes	MTW Activity changes	Clarification/change to policy
Chapter 1: Overview of the Program and Plan – describes the overall program including purpose, intent and use of the plan	No changes	No changes	Updated mission statement; Added reference to EHV's
Chapter 2: Fair Housing and Equal Opportunity – explains the requirements for PHAs regarding civil rights and affirmatively furthering fair housing	Minor HUD updates	No changes	Added remote briefings, hearings and reviews wording
Chapter 3: Eligibility – details requirements for a household to be eligible for housing	HUD updates re: use of the HUD EIV system	No changes	Added definitions for transgender and nonbinary
Chapter 4: Applicants, Wait Lists and Tenant Selection – explains how applications are accepted, wait lists and lottery managed, and the order applicants are selected	No changes	No changes	Updated lottery opening to 2 times per year; Added Madison to PBV list; Changed wait list holder for BSH units to BHP; Added EHV's and Mainstream awards; Removed Next Step Housing Preference (replaced with set aside preference); Updated intake process
Chapter 5: Briefings and Voucher Issuance – includes requirements for briefings and occupancy standards	HUD changes re: remote briefings	No changes	Lowered age at which children of opposite sex are assigned own bedroom; clarified suspension of voucher term
Chapter 6: Income and Subsidy Determinations – defines annual income and how subsidy is calculated	No changes	No changes	Clarified when misc. deposits will be excluded from income
Chapter 7: Verifications – explains acceptable forms of verification	No changes	No changes	Minor wording updates

for all factors that determine eligibility			
Chapter 8: Housing Quality Standards and Rent Reasonableness – explains requirements for units to pass both tests prior to paying assistance	Minor HUD updates	No changes	Minor wording updates
Chapter 9: General Leasing Process – covers lease up process from submission of Request for Tenancy Approval to execution of Housing Assistance Payment Contract	No changes	Added security deposit loan fund information	Minor wording changes
Chapter 10: Moving with Continued Assistance – explains how and where a household can move while continuing to receive housing assistance	No changes	No changes	Removed requirement to be in compliance with FSS prior to being able to move with a voucher
Chapter 11: Income Reexaminations – explains policies regarding regularly scheduled and interim exams	No changes	No changes	Minor wording changes
Chapter 12: Termination of Tenancy and Assistance – describes policies on optional and mandatory terminations	No changes	No changes	Removed reason for termination for failing to meet FSS obligations; minor wording changes
Chapter 13: Owners – discusses the roles and relationship between PHA and owners/landlords and HAP contracts	No changes	No changes	Minor wording changes
Chapter 14: Program Integrity – covers policies designed to prevent, detect, investigate, and resolve instances of program abuse or fraud	No changes	No changes	Minor wording changes
Chapter 15: Special Housing Types – includes policies on single room occupancy, shared housing, congregate housing, group homes, manufactured homes, cooperative housing and home ownership	No changes	No changes	Clarified the family receives the payment for manufactured homes when the HAP is more than the lot rent
Chapter 16: Program Administration – covers program	HUD updates re: virtual reviews	No changes	Added regulation wording to be clearer

standards, informal reviews and hearings, debts owed to the PHA, the MTW plan and report, insufficient funding and the Violence Against Women Act	and hearings; VAWA updates		
Chapter 17: Project Based Vouchers – describes HUD rules and BHP polices regarding vouchers that have been project based	No changes	Eliminated MTW Activity 2014-5	Removed requirement to be in compliance with FSS prior to being able to move with a voucher; Added PBV exhibit for 30 Pearl PBV units: Clarification for next available voucher requests
Chapter 18: Rental Assistance Demonstration – covers the public housing properties that were converted to vouchers under the RAD program	No changes	No changes	Inspection schedule clarified; Changed wait list holder for BSH units to BHP; Clarification for next available voucher requests

A red-lined copy of the Admin Plan has been sent electronically.

Next Steps:

Subject to Board approval of the changes, the documents will be posted for public review on our website no later than October 15, 2021. The required posting is for 45 days. Two public hearings will be held on Wednesday, November 17, 2021 (one in person and one via Zoom). All current Housing Choice Voucher participants will be notified via postcard that changes are being proposed, how to learn more about those changes, and how to submit comments. Comments can be submitted to Karen at hcv@boulderhousing.org or via phone at 720-564-4631. Comments from the Commissioners are always welcome.

Following the 45-day period, the document will return to the Board for final adoption at the December 2021 meeting.

Action requested

This will be the Board’s first reading of the Housing Choice Voucher Administrative Plan. The action requested is to authorize release of the document for public comment with final adoption by the Board at the December 2021 meeting.