



**RAB Comments and HPHA Response
Proposed 2017 – 2018 PHA Annual Plan Revisions
(FY 2017 - 2018)**

1. **Proposed Revision:** Housing Choice Voucher Administration – Evict tenants that engage in drugs and serious criminal activities that threaten the health and safety of the public housing projects.

RAB comment: The RAB supports the proposed revisions, and suggests that the possession of a valid marijuana card should exempt a tenant for marijuana use. Additionally, the RAB suggests that a policy be adopted, similar to the state policy, for medical marijuana.

HPHA Response: The HPHA is required to comply with federal law on the use of controlled substances, including medical marijuana, in federal public housing. The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

2. **Proposed Revision:** Housing Choice Voucher Administration – Update policy on additions to the household of an additional family consisting of more than one member to the Housing Choice Voucher except by birth, adoption, or court awarded custody, or marriage, when the addition would increase the subsidy to the family.

RAB comment: The RAB supports the proposed revision as it will align Section 8 rules with public housing rules.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

3. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy on changes to household composition when a family member who is 18 and over removes themselves from the household; and to establish the following policies when such family members seek readmission to the household:

- A. They are prohibited from readmission to the household.
- B. They are required to apply as new applicants for placement on the waitlist.
- C. The HPHA may consider medical hardship or other extenuating circumstances, and if determined necessary as a reasonable



accommodation, may allow such family member to be added to the household as a live-in-aide only

RAB comment: The RAB supports the proposed revision which will require Section 8 voucher recipients to adhere to the same regulations as those in public housing.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

4. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy to determine the amount of allowances for purposes of rent and subsidy determination in the Housing Choice Voucher program, establish policy to cap the amount of child care expenses that can be claimed at the amount of the lower wage earned by working family members.

RAB comment: The RAB supports the proposed revision as it will prevent tenants from receiving a larger subsidy than when they are expending for child care.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

5. **Proposed Revision:** Housing Choice Voucher Administration – Update policy regarding the designation of the head of household, spouse, and co-head of the family in the event of marriage of the head or co-head individuals who may not be related by blood, marriage, adoption, or other operation of law, subsequent to admission to the program, to clarify as follows:
- A. If the head marries, the head's spouse automatically replaces the original co-head as the spouse. The original co-head automatically becomes an authorized family member.
 - B. If the co-head marries, as a family can only have a spouse or co-head, but not both, the family determines whether the co-head's spouse will become the head of household, or an authorized household member.

RAB comment: The RAB supports the proposed revision to align Section 8 head and co-head of household rules with public housing rules.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.



6. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy in the Section 8 program to determine which household will include a minor’s unearned income into the household’s income, in determining unit size, and eligible deductions where two households in the assisted housing programs share custody of minors.

RAB comment: The RAB supports the proposed revision as it will align Section 8 policies with public housing policies.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

7. **Proposed Revision:** Housing Choice Voucher Administration – Adopt revisions to the Section 8 policy to shorten the length of time for a temporary absence from 120 days to 90 days, other than students and foster care.

RAB comment: The RAB supports the proposed revision but feels that extenuating circumstances should be considered.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

8. **Proposed Revision:** Housing Choice Voucher Administration – Adopt policy requiring live-in aides to establish legal residency in the United States to receive subsidy for an additional bedroom in the Section 8 program, and to occupy an additional bedroom in the public housing program.

RAB comment: The RAB strongly supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

9. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy when determining income from assets for purposes of eligibility and subsidy determination in the Public Housing program and the Section 8 program, update the policy determining the value of a checking account to be consistent with the policy determining the value of a savings account, by using the current balance, to reduce administrative burden and excessive paperwork and added expense for the applicant.



RAB comment: The RAB supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

10. **Proposed Revision:** Housing Choice Voucher Administration – Adopt policy to include special unit types including single room occupancy to expand lease up options for voucher holders and ensure that the program is readily accessible to and usable by persons with disabilities in accordance with 24 CFR Part 8.

RAB comment: The RAB supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

11. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy to pay landlords via electronic deposit into their account.

RAB comment: The RAB supports the proposed revision as it will increase efficiency within the program.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

12. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy that does not allow the owner to keep the housing assistance payment for the remainder of the month when the family moves out of the unit. Housing assistance payments end the date HPHA determines the family has vacated the unit. Amounts overpaid to the owner must be returned to HPHA.

RAB comment: The RAB supports the proposed revision which it feels is a fair policy change.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.



13. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy that allows the HPHA to change a participant’s voucher size at the time of the change to the household and not wait until the next recertification.

RAB comment: The RAB supports the proposed revision, specifically as waiting for recertification could have a big impact for those requiring larger units.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

14. **Proposed Revision:** Housing Choice Voucher Administration – Update policy for repayment agreements

RAB comment: The RAB supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

**RAB Comments and HPHA Response
Proposed 2017 – 2018 PHA Annual Plan Amended Revisions
(FY 2017 - 2018)
June 8, 2017**

1. **Proposed Revision:** Housing Choice Voucher Administration – Adopt rules where the HPHA may award Section 8 Housing Choice Vouchers to public housing residents for the following reasons in the following order and not equal priority:

1. Existing public housing tenants who are involuntarily displaced for reasons such as for relocation due to modernization activity, or based on an emergency where conditions of the public housing dwelling unit, building, or project pose an immediate, verifiable threat to life, health or safety of the family, and the family cannot be relocated to another public housing unit in the same program, meeting their needs.
2. Approved for a transfer as a reasonable accommodation for a unit with special features based on need and availability.
3. Victims of domestic violence, or stalking, or reprisals, or hate crime, and cannot be safely transferred to another public housing unit in the same program.
4. Homeless families, provided “Homeless” is defined by HUD.



RAB comment: The RAB supports the proposed revision, agreeing that access to a voucher for a reasonable accommodation based on need and availability, allows better access for individuals and families in instances where suitable public housing units are not available.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

2. **Proposed Revision:** Housing Choice Voucher Administration – Adopt a policy which allows for a tenant with a live-in aide who is lawfully present or admitted to the United States to receive subsidy for an additional bedroom in the Section 8 program, or to occupy a unit in the public housing program.

RAB comment: The RAB supports the proposed revision, agreeing that a similar standard for admittance of tenants to public housing should apply to live-in aides.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.

3. **Proposed Revision:** School Street Redevelopment - The HPHA is currently working on a mixed finance redevelopment of its School Street Administrative Offices. The current proposed project is contemplating the use of various forms of financing. The HPHA acknowledges that the proposed project may change over time and as such, the HPHA is providing notices of the potential for this public-private mixed-finance redevelopment to consider the use of various subsidies, including all eligible forms of federal funding sources that the project qualifies for such as project based vouchers, low income housing tax credits, and public housing subsidies.

RAB comments: The RAB supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB and will continue to consult with the RAB on future policy changes.