

CURRENT ADMINISTRATIVE PLAN VS. PROPOSED ADMINISTRATIVE PLAN AMENDMENTS

Current Administrative Plan	Proposed Administrative Plan Amendments	Comment
<p>GHURA’s current Administrative Plan policy in reference to occupancy and subsidy standards does not consider the living room as a ‘bedroom’ when determining the family unit (voucher) size in Chapter 5-II.B.</p> <p>HUD regulations at 24 CFR 982.401 C (d) (2) (ii) states that a living room may be used as sleeping (bedroom) space, but no more than two persons may occupy the space.</p>	<p>HUD Notice PIH 2011-28 (HA), Subsidy Standards, states that the PHA may revise subsidy standards that exceed minimum HUD requirements to reduce bedroom size eligibility in accordance with 24 CFR 982.402. Subsidy standards must be consistent with the HQS space requirement in 24 CFR 982.401 (d). GHURA proposes to amend its current policy to clearly state that it will count the living/sleeping room as a bedroom when determining the family unit (voucher) size. (This information is reflected in GHURA’s chart for determining the minimum and maximum persons in a household. The maximum number of persons in the household has increased by two persons (with the exception of the studio) based on voucher bedroom size.) Additionally, GHURA proposes to remove the citation that “Live-in aides will be allocated a separate bedroom”. (Requests for exceptions to this policy must be submitted in writing and justified).</p>	<p>See Administrative Plan, Chapter 5-II.B. Determining Family Unit (Voucher) Size [24 CFR 982.402] pg. 5-7 & 5-8</p> <p>This change in policy will assist in sparing families from being terminated due to insufficient funding from the program if families rent a unit one size smaller than what they are initially eligible for (without creating overcrowding).</p>
<p>GHURA’s current Administrative Plan policy requires a physical inspection for deficiencies of failed HQS units. Per HUD Notice 2012-15 (HA), the Notice provides guidance on PHAs administering the HCV program may take to streamline administrative practices and reduce administrative costs.</p>	<p>The proposed amendment to the Administrative Plan policy, in accordance with HUD Notice 1012-15 (HA) will allow GHURA to accept documentation such as receipts, photos, and certified statements from landlords via email, fax or hand delivered in person, that cited deficiencies have been corrected under failed HQS units. The amendment will state that if the documentation does not satisfy the requirements for correcting the deficiencies as cited by the Inspector, the Inspector may at his/her discretion require a physical re-inspection to physically verify the cited deficiencies have been corrected.</p>	<p>See Administrative Plan Chapter 8.II.F. Inspection Results and Re-inspections for Units Under HAP Contract pg. 8-11</p>

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<p>GHURA’s current Administrative Plan policy does not clearly state the denial of portability and moves within the PHA Jurisdiction. The denial of portability and moves within the PHA Jurisdiction is partially covered under the current Administrative Plan in Chapter 10.II.B, Initial PHA Role, for outgoing ports and moves.</p>	<p>The proposed amendment to the Administrative Plan policy will include language in Chapter 10.II.C, Receiving PHA Role that will cover the denial of assistance for incoming ports and moves due to insufficient funding.</p>	<p>See Administrative Plan Chapter 10.II.C. Receiving PHA Role pg. 10-10</p>

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<p>GHURA's current Administrative Plan policy states that an interim re-exam will be performed when the family reports \$2,400 or more of income. This policy was written with the intention of allowing families to report only significant increases of their family income while reducing the administrative burden of conducting several interim re-exams between annual contracts. Additionally, the current Administrative Plan policy requires that GHURA perform interim re-examinations when families request to add adult family members between annual re-examinations.</p>	<p>The proposed amendment to the Administrative Plan policy will require families to report any increase in income for the family. The revision will allow GHURA to make adjustments to the family's subsidy if there are any impacts. Also, GHURA proposes to amend this section of its policy to indicate that families requesting to add adult family members will only be permitted to do so during annual reexaminations. Furthermore, families wishing to add adult family members may not be permitted if the result will be an increase in bedroom sizes during the term of the contract.</p>	<p>See Administrative Plan Chapter 11.II.B. Changes in Family and Household Composition pg. 11-7, 11.I.C. Conducting Annual Reexaminations pg. 11-3, and 11.II.C. Changes Affecting Income or Expenses pg. 11-10</p>
<p>GHURA's current Administrative Plan policy allows the termination of assistance due to Insufficient Funding per 24 CFR 982.454.</p>	<p>The proposed amendment to the Administrative Plan updates the current sequence of termination of assistance due to Insufficient Funding.</p>	<p>See Administrative Plan Chapter 12.I.E. Mandatory Policies and Other Authorized Terminations pg. 12-6 and 12-7</p>