

CURRENT ADMINISTRATIVE PLAN VS. PROPOSED 2015 ADMINISTRATIVE PLAN

Current Administrative Plan	Proposed 2015 Administrative Plan	Comment
<p>Placement on the Waiting List: The current plan describes placement using the 2- step process of how applicants are placed on the waiting list after submitting a pre-application.</p>	<p>The proposed Administrative Plan proposes to include a “Lottery System” as an alternative to establishing a wait list. Families are randomly selected and placed in a chronological order on a wait list. Reference: Chapter 4, page 4-4</p>	<p>This discretionary policy change is pertinent because it provides the Authority an alternative process in establishing a wait list by randomly selecting families through a lottery system.</p>
<p>Number of Wait List: The current policy described in Chapter 4 states that GHURA will establish and maintain a single wait list.</p>	<p>The proposed policy change is for GHURA to establish and maintain two separate wait list for tenant-based and project-based programs. Reference: Chapter 4, page 4-5</p>	<p>The policy is to accommodate the conversion of 112 tenant-based vouchers to project-based.</p>
<p>Mainstream Program: The current program describes one of the target funded program as “Mainstream Opportunities program for persons with Disabilities.”</p>	<p>The Mainstream Program has changed to “Non elderly Persons with Disabilities”. Reference: Change 4, page 4-9</p>	<p>The Program has changed as per HUD.</p>
<p>Project-based Program: The current policy does not include the project-based program as one of GHURA’s programs under Section 8.</p>	<p>The proposed policy change includes Project-based Program as one of GHURA’s programs. Reference: Chapter 4, page 4-10</p>	<p>The addition of the project-based in the Administrative plan is necessary to accommodate the conversion of 112 tenant-based vouchers to project-based.</p>
<p>Suspension of the Voucher Term: The current policy states under portability that GHURA will not suspend the voucher term when the Request For Tenancy Approval is received.</p>	<p>The proposed policy changes mandates PHA’s to suspend the term of the voucher when a family submits a Request for Tenancy Approval (RFTA). The suspension begins when the family submits the RFTA and ends when the family is approved or disapproved and is notified in writing. Ref: Chapter 5, page 5-11</p>	<p>The policy change is a statutory change.</p>
<p>Biennial Inspection and Alternative Inspection Methods: GHURA’s current policy states that GHURA must perform Annual Inspections, and does not provide for other acceptable alternative inspection methods.</p>	<p>The proposed change in policy mandates PHAs to perform biennial inspections and to adopt other acceptable methods of inspections which shall provide for equal or greater protection to the occupants of units under contract. Ref: Chapter 8; pg. 8-6, 9, 10</p>	<p>This change is a statutory requirement.</p>

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<p>Utility Allowance: GHURA’s current policy states that GHURA must apply the correct utility allowance based on the actual size of the unit under contract.</p>	<p>The proposed change in policy mandates PHAs to <u>use the lower</u> utility allowance based on the unit size the family qualifies for or the utility allowance amount for the actual size of the unit rented by the family. At the request of a family with a person with disabilities, the PHA must approve a utility allowance higher than the applicable amount if such a higher utility allowance is needed as a reasonable accommodation. Ref: Chapter 6, pg. 6-39</p>	<p>This change is a statutory requirement.</p>
<p>Denial of Portability due to insufficient funding: The current policy states that GHURA may deny a family from porting due to insufficient funding.</p>	<p>The proposed change requires PHA’s to notify HUD within ten (10) business days after denying a family to port due to insufficient funding.</p> <p>Reference: Chapter 10, pg. 10-2</p>	<p>This policy is a regulatory mandate.</p>
<p>Portability: GHURA’s current policy states that GHURA will not approve an extension after it expires.</p>	<p>The proposed change requires PHA’s the receiving PHA to provide at least a 30-day extension past the initial PHA’s expiration date.</p> <p>Reference: Chapter 10, page 10-7</p>	<p>This is a regulatory change.</p>
<p>Policies Governing the Project-based Program: Current policy describes policies that are applicable under the project-based program.</p>	<p>This policy is expanded to include other applicable policies, to include 24 CFR Parts 5, 908 and 985.</p> <p>Reference: Chapter 17, pg. 17-2</p>	<p>The policies are necessary for additional guidance for the PVB program.</p>
<p>Biennial Inspections: Current inspection policy reflects the required “annual” inspection.</p>	<p>The policy has changes from “annual to “biennial” inspections, as per HUD.</p> <p>Reference: Chapter 17, pg. 17-10</p>	<p>The change is due to a statutory requirement.</p>

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<p>HAP contract extensions under the Project-based Program: the current policy states that the HAP contract under the project-based program may not exceed 10 years with extensions of 5 years at a time.</p>	<p>The proposed policy change states that the HAP contract under the project-based program may be up to 15 years, and extensions may be for increments of 5 years, not to exceed a total of 15 years. Reference: Chapter 17, pg. 17-15</p>	<p>This is a regulatory change.</p>
<p>Remedies for HQS Violations: Current policy does not clarify GHURA's remedies.</p>	<p>The remedies for HQS violations are clarified, which states that GHURA will not make any HAP payments to the owner during of non-compliance. Reference: Chapter 17, pg. 17-15</p>	<p>The clarification is necessary to ensure program compliance.</p>
<p>Substitution of Contract Units. The current policy does not state whether it will amend the HAP contract to allow for substitution of contract units.</p>	<p>The policy permits for substitution of units in the same building. Reference: Chapter 17, pg. 17-16</p>	<p>The ability to substitute units is important in the event that a situation makes it necessary.</p>
<p>Selection from the waiting list. The current policy does not specify whether or not a GHURA will have a separate waiting list for the Project-based program.</p>	<p>A policy is included to allow for a separate waiting list for the Project-based Program. Reference: Chapter 17-19</p>	<p>A separate waiting is needed specifically for the PBV program.</p>
<p>Family Briefing: No specific policy exists for providing PBV families an informational briefing.</p>	<p>HUD mandates that families admitted to the Section 8 PBV program must be provided an informational briefing to explain the program benefits. Reference: Chapter 17, pg. 17-21</p>	<p>A new mandate.</p>

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<p>Persons with limited English proficiency: No clear policy on how to address persons with limited English proficiency exists.</p>	<p>A policy is added to address LEP. Reference: Chapter 17, pg. 17-21</p>	<p>A HUD mandate</p>
<p>Owner selection: the current policy does not specify how families will be selected for the PBV program</p>	<p>The policy changes states that families will be selected from the waiting list and referred to the owner for suitability screening and approval. Reference: Chapter 17, pg. 17-22</p>	<p>A HUD mandate</p>