

Overview of Draft Modifications to the Agency Plan and Related Documents

Document 1: Santa Cruz County Agency Plan

There are no changes proposed to the Santa Cruz County Agency Plan

Document 2: Hollister Agency Plan

There are no changes proposed to the Santa Cruz County Agency Plan

Document 3: Santa Cruz County Housing Choice Voucher Administrative Plan

(Same modifications apply to Hollister Administrative Plan)

Change	Page	Previous Wording	Proposed Wording	Explanation
1	6	<p>Extensions will be granted:</p> <ol style="list-style-type: none"> 1. If voucher holders provide proof that despite a diligent effort, they could not find a unit suitable to their needs; or 2. in special cases only, such as a large family, a “special needs” family, hospitalization or drug rehabilitation, death in the family, etc. <p>Such extensions will be granted for up to 60 days.</p>	<p>Extensions may be granted:</p> <ol style="list-style-type: none"> 1. If voucher holders provide proof that despite a diligent effort, they could not find a unit suitable to their needs; or 2. in special cases only, such as a large family, a “special needs” family, hospitalization or drug rehabilitation, death in the family, etc. <p>Such extensions may be granted for up to 60 days if the Housing Authority is currently granting extensions.</p>	<p>Extensions of a voucher are never guaranteed. Therefore, the words “will be granted” have been replaced with “may be granted”. Additionally, the proposed wording clarifies that there may be times when extensions cannot be granted due to outside factors (such as lease up rates or HAP funding).</p>
2	6	<p>Suspensions of the term of the Housing Choice Voucher will occur while the Housing Authority inspects the unit and processes the Request for Tenancy Approval. Any days during which the unit is not available for inspection will not count as part of the suspension of the voucher term.</p>		<p>This wording has been removed because it is not a HUD requirement or a Housing Authority practice.</p>
3	8	<p>There is not an accessible unit available for the family, and the length of the wait for a vacancy is determined to be unreasonably long.</p>	<p>There is not an accessible unit available for the family, and the length of the wait for a vacancy is determined to be unreasonably long (at least one year).</p>	<p>For the purposes of determining when a disabled LIPH tenant who is waiting for an accessible unit may receive a Housing Choice Voucher to search for an accessible unit in the private market, the proposed change defines “unreasonably long” to be at least one year.</p>
4	9	<p>The owner of the project is responsible for tenant outreach, and the Housing Authority will monitor for compliance with tenant outreach regulations and procedures.</p>	<p>The owner of the project is responsible for tenant outreach.</p>	<p>The Housing Authority is not responsible for monitoring landlord outreach to tenants.</p>

Change	Page	Previous Wording	Proposed Wording	Explanation
5	11		<p>Households with children who have been placed in foster care will keep their voucher size for at least 12 months after the child is removed. However, at the annual review following 12 months after removal (the second AR after removal) the household will be downsized. If and when the child returns from foster placement, the household will be upsized at the interim and the payment standard will be updated at that time. The household will not be required to wait until their next annual re-examination to be upsized or to have their payment standard updated.</p> <p>Households with military servicepersons on active duty will be downsized at the first transfer or annual review following the departure of the serviceperson. When and if military servicepersons on active duty return, the household will be upsized and the payment standard will be updated at the interim. The household will not be required to wait until their next annual re-examination to be upsized or to have their payment standard updated.</p>	<p>This wording has been added to provide additional clarification about the impact on voucher size when household members are placed into (or return from) either foster care or active military duty.</p>

Change	Page	Previous Wording	Proposed Wording	Explanation
6	11	<p>However, temporary family members are not considered for purposes of determining voucher size (see Subsidy Standards below).</p>	<p>However, temporary family members are not considered for purposes of determining voucher size, and are not eligible to receive the voucher in the event of a family break up (see Subsidy Standards below).</p> <p><u>Temporary Family Members Who Move In and Out of the Unit</u> The income of a temporary family member is counted towards household income while the temporary family member resides in the assisted unit. Therefore, temporary family members who move in to the unit for a period of time will be added to the household with an interim while they are living in the unit. Later, they will be removed from the household when they move out of the unit. Temporary family members are not considered for purposes of determining voucher size, even if their income is counted. Additionally, temporary family members are not eligible to receive the voucher in the event that the family breaks up.</p> <p><u>Temporary Minor Family Members Who Stay in the Unit a Few Days Per Week</u> Minor children who stay in the household a few days per week (less than 51% of the time and less than 184 days of the year) will not be added to the household. No persons other than minor children will be approved to stay in the household for a few days per week. Instead, other individuals will be considered to be guests (see definition of guest).</p> <p><u>Definition of Other Household Member</u> Other household members are those persons who have been approved by the Housing Authority to reside in the assisted unit, but who will not be considered for the purpose of determining voucher size, and who are not eligible to receive the voucher in the event that the family breaks up. Other household members may not reside in the assisted unit if their presence results in overcrowding. Income received by other household members is included in the household's income calculation.</p>	<p>This addition expands the definition of temporary family members and provides a definition for "other" household members that may move into the assisted unit but do not have an impact on voucher size.</p>

Change	Page	Previous Wording	Proposed Wording	Explanation
7	13	The Housing Authority has the discretion to consider all factors in the case, including the seriousness of the case, the extent of participation of the culpability of individual family members, and the effects of denial or termination of assistance on other family members who were not involved in the action.	The Housing Authority has the discretion to consider all factors in the case, including the seriousness of the case, the extent of participation of the culpability of individual family members, past history , and the effects of denial or termination of assistance on other family members who were not involved in the action.	This addition allows the Housing Authority to consider the past history of an individual, among other factors, when determining whether to deny or terminate assistance.
8	13	To expand the number of rental property owners participating in the Section 8 Housing Choice Voucher Program, the Housing Authority mails promotional material to property management agencies on an annual basis , conducts landlord briefings on an annual basis, and places ads in the newspaper.	To expand the number of rental property owners participating in the Section 8 Housing Choice Voucher Program, the Housing Authority mails promotional material to property management agencies on an as needed basis , conducts landlord briefings on an annual basis, and places ads in the newspaper.	The words “annual basis” were replaced with “as needed basis” to allow the Housing Authority greater flexibility in determining when to send promotional materials.
9	13	The Housing Authority of the County of Santa Cruz works closely with the local Real Estate Board .	The Housing Authority of the County of Santa Cruz works closely with real estate professionals .	The words “Real Estate Board” were replaced with “real estate professionals” to more closely reflect the Agency’s interactions with such professionals.
10	14	The Housing Authority of the County of Santa Cruz may also contact the owner and discuss the equal housing laws and try to ascertain if there is any discrimination.		This wording has been removed because it is not appropriate for the Housing Authority to try to determine whether or not housing discrimination has taken place. Instead, the Housing Authority will assist someone in filing a complaint, and will forward the complaint to the field office.
11	14	Every family member that resides in the household at least 51% of the time, regardless of age, is to be counted as a person. An unborn child will not be counted as a person, unless the pregnant woman is the only person in the household. College students or children living with more than one family will only be included as family members if they reside in the assisted household at least 51% of the time.	The Housing Authority will review each household composition to determine which household members may impact voucher size, and which household members do not impact voucher size, based on the agency plan in place at the time each member was added to the household. An unborn child will not be counted as a person, unless the pregnant woman is the only person in the household. Temporary household members, guests, family members of live-in aides, and other household members (as defined above) will not be counted for the purpose of determining voucher size.	This section has been revised to clarify that some household members (such as temporary and “other” household members) may not be counted when determining voucher size.
12	15	The subsidy standards are as follows.	The subsidy standards are as follows. For the purpose of the tables below, the number of household members includes only those persons that are included when considering voucher size. Temporary household members, guests, family members of live-in aides, and “other” household members (as defined above) are not considered when determining voucher size, so they are not reflected in the tables below.	Additional wording was added to provide more information about how to read the tables below, and to re-iterate that some household members may not be counted when determining voucher size.

Change	Page	Previous Wording	Proposed Wording	Explanation
13	15	Family Size Subsidy Size	Number of Household Members Impacting Subsidy Size Voucher Size	The column headings on the subsidy table have been renamed to more accurately reflect the data in the table.
14	17	No temporary family member or guest may receive the voucher.	No temporary family member, other household member (as defined above), or guest may receive the voucher.	This section has been expanded to include “other household members” as previously defined, in the list of individuals who may not receive the voucher in the event of a family break up.
15	17	Informal reviews for applicants will be conducted in compliance with HUD regulations. Once applicants have been notified of their right to an informal review, they have 15 calendar days to request a review in writing. Informal hearings for participants will be conducted in compliance with HUD regulations. Once participants have been notified of their right to an informal hearing, they have 15 calendar days to request a hearing in writing.	Please see pages 17 – 20 to review the additional information provided regarding informal reviews for applicants and informal hearings for program participants.	The section has been expanded to provide more information about our informal review process for applicants and our informal hearing process for program participants.

Change	Page	Previous Wording	Proposed Wording	Explanation
16	27	<p><u>The following adults may be added to the household, and may increase the family’s voucher size.</u></p> <ul style="list-style-type: none"> ▪ The adult child or parent of the head of household. <p><u>The following adults may be added to the household, but will NOT increase the family’s voucher size.</u></p> <ul style="list-style-type: none"> ▪ The spouse, registered domestic partner, or significant other of the head of household. <p><u>The following children may be added to the household, and may increase the family’s voucher size.</u></p> <ul style="list-style-type: none"> ▪ Birth child of head of household. ▪ Birth child of the spouse or <u>registered domestic partner</u> of the head of household. Documentation supporting the legal status of the marriage or domestic partnership must be provided by the family, if they have not already done so. ▪ Children added through adoption, foster placement, or court awarded custody to the head of household or to the spouse or <u>registered domestic partner</u> of the head of household. Documentation supporting the legal status of the marriage or domestic partnership must be provided by the family, if they have not already done so. <p><u>The following children may be added to the household, but will NOT increase the family’s voucher size.</u></p> <ul style="list-style-type: none"> ▪ Birth child of any existing household member, as long as the addition of that child does not cause overcrowding in the unit. 	<p>When a family member is added, staff must first re-determine the family subsidy standard, using the new subsidy standards, without this new family member. Then staff will apply the following rules. Please note that “parent” refers to the birth or adoptive parent, and “child” refers to children by birth, court awarded custody, or (for minor children only) by foster placement.</p> <p><u>The following individuals may be added to the household, and may increase the family’s voucher size.</u></p> <ul style="list-style-type: none"> ▪ The spouse, registered domestic partner, or significant other of the head of household. ▪ The parent of the head of household. ▪ The parent of the head of household’s spouse / registered domestic partner ▪ The child of the head of household. ▪ The child of the head of household’s spouse / registered domestic partner <p><u>The following individuals may be added to the household, but will NOT increase the family’s voucher size. Additionally, the following individuals may only be added to the household if they do not result in over-crowding, and will not be eligible to receive the voucher if the family breaks up.</u></p> <ul style="list-style-type: none"> ▪ The grandparent of the head of household. ▪ The grandparent of the head of household’s spouse / registered domestic partner ▪ The grandchild of the head of household ▪ The grandchild of the head of household’s spouse / registered domestic partner ▪ The minor birth child of any household member other than the head of household or the spouse / registered domestic partner of the head of household 	<p>This section includes proposed changes to who may move into an assisted unit. The proposed change would allow the grandchildren and / or grandparents to move into the assisted unit, although the voucher size (and corresponding subsidy) would not be increased to accommodate grandparents and grandchildren. Additionally, the grandparents and grandchildren could only move in if they do not cause overcrowding in the unit.</p>

Document 4: Santa Cruz County Public Housing Admissions and Continued Occupancy Plan (ACOP)

Change	Page	Previous Wording	Proposed Wording	Explanation
17	3	On a continuous basis the average income of families residing in each of our developments will be compared to the average income of all public housing tenants. When the average income of tenants in a development is lower than 85% or greater than 115% of the average of all public housing tenants, the level of marketing strategies and deconcentration incentives to implement deconcentration measures will be implemented.		HUD has recently made changes to how public housing complexes may be grouped. As a result, all of this Agency’s public housing complexes are now considered one “development” by HUD, and the deconcentration requirements no longer apply and the wording has been removed.
18	18	It is the Housing Authority’s policy to provide for deconcentration of poverty and encourage a mix of income groups in each LIPH complex. Therefore, before filling a vacant unit in the LIPH program with a new family from the waiting list, Property Management staff will check the deconcentration report to ensure that the average income of tenants on a development is between 85% and 115% of the average of all public housing tenants. If a development has an average income that is either lower than 85% or higher than 115% of the average of all public housing tenants, the Housing Authority will select a family from the waiting list that will help to retain a balanced range of incomes. Therefore, in some cases, the Housing Authority may skip past the family with the earliest placement date to ensure that deconcentration objectives are achieved.		See above regarding removal of wording pertaining to deconcentration requirements.

Change	Page	Previous Wording	Proposed Wording	Explanation
19	29	<p>Tracking Systems:</p> <p>The E&O Department is responsible for entering eligibility status in ECS and for establishing tracking systems to ensure compliance with annual recertification requirements. The E&O Department is also responsible for tracking non-compliance dates to ensure that leases are not renewed if compliance has not been verified. A log in Excel format will be maintained to keep track of non-compliance in addition to a tickler date system.</p> <p>The Property Management Department is responsible for final non-renewal of leases after the E&O Department informs them of instances of non-compliance.</p>		<p>This wording regarding the specific tracking systems used by the Agency has been removed, as this level of detail is not required in this document.</p>
20	29	<p>The voluntary program size is 25, although if more than 25 families are interested in enrolling, up to a total of 50 families may enroll.</p>	<p>The voluntary program size is 25.</p>	<p>Funding for FSS coordinators used to staff the program is not guaranteed, and must be applied for through a competitive application process annually. Therefore, wording about expanding the program past the current program size has been removed. HUD has recently proposed changes to the funding structure to this program, which may result in greater stability. Therefore, we may expand the FSS program in future years.</p>