



# Summary of Proposed Changes to the 2020-21 Admissions and Continued Occupancy Policy

**Section II-F– Local Preference and Unit Selection:** Per HUD PIH 2019-26, the working family preference is removed as a tool for waiting list provision.

CMHA is removing language from the Admissions and Continued Occupancy that outlines the administration of a preference for working families. In addition, since the working family local preference was also available to a family if the head, spouse/co-head, or sole member was elderly or disabled; then those families will also not receive the working family preference. The reference to working families, disabled families or elderly receiving 3 points will be removed from the Section F (2) in regards to the Local Preference and Points Allocation schedule. In addition, definitions of the working family preference will be removed from Section II-F (3) and Section XVII of the Admissions and Continued Occupancy Policy.

**Section II-B– Local Preference and Unit Selection:** Per HOTMA regulations the eligibility for LIPH assisted housing is clarified by the following provision:

## **B. Qualification for Admission**

1. It is CMHA's policy to only admit qualified applicants<sup>12</sup>.

Assistance may not be provided for a family whose net assets exceed \$100,000 or who has an ownership interest and the legal right to reside in real property suitable for occupancy. Does not apply to victims of domestic violence, families offering the real property for sale, or persons receiving homeownership assistance or assistance for the rental of manufactured housing

**Section II-C – Wait List Management:** Public housing developments that are converted to affordable housing will have their wait lists closed with present applicants being purged and placed on a new site-based wait list.

Under the HUD Rental Assistance Demonstration (RAD), CMHA is in the process of converting several public housing developments to affordable housing with project-based rental assistance. When this occurs at a development, the associated public housing wait list will be closed with all applicants being removed from the wait list and a new site-based wait list will be established for the

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<sup>1</sup> -- Assistance may not be provided for a family whose net assets exceed \$100,000 or who has an ownership interest and the legal right to reside in real property suitable for occupancy--Does not apply to victims of domestic violence, families offering the real property for sale, or persons receiving homeownership assistance or assistance for the rental of manufactured housing.

--PHAs have the option not to enforce the limitation on eligibility based on assets for public housing residents

<sup>2</sup> The term "qualified" refers to applicants who meet the applicant selection standards. Eligibility is a term having specific meaning under the Housing Act of 1937. In order to be eligible, a family must meet four tests: (1) they must meet HA's definition of family; (2) have an Annual Income at or below program guidelines; (3) each family member; and (4) each family member receiving assistance must be a citizen or non-citizen with eligible immigration status.

development. Under Section II-C of the Admissions and Continued Occupancy Policy, line 5 is to be added:

*5. Public housing developments that are converted to affordable housing will have their wait lists closed with present applicants being purged and placed on a new site-based wait list.*

**Section II-F – Wait List Management:** CMHA has clarified its preference listing. The clarifications will allow for preferences points given to Homeless Partners or Third-Party Certification in addition to the Homeless Coalition. Additionally, the Family Unification and Youth Aging out of Foster Care were provided with their separate preference category. The definition for the homeless preference was further expanded.

<b>Referral from Local Homeless Partners or Third-Party Certification</b> <b>(Broadens the definition to allow for various Homelessness Partners in addition to the Homeless Coalition)</b>	<b>4 Points</b>
<b>Family Unification (see below/to be defined)</b>	<b>2 Points</b>
<b>Youths aging out of foster care who are between the ages of 18-24.</b>	<b>2 Points</b>

**3. Definitions of Preferences:**

(4) Temporarily/Transient Accommodations provided on a temporary basis to keep the individual family from the falling into to foregoing categories..

(d) Family Reunification: the term "family reunification" as used this preference section is defined to describe a variety of programs that are intended to provide services to children and families who are experiencing serious problems that lead to the placement of children in foster care or otherwise result in the dissolution of the family unit, **or families who are at risk of homelessness.**

**Section VI-B Over-Income Households:** CMHA is replacing its procedure for handling over income households that was developed when the policy was discretionary and now adopting language that HUD has implemented for how to administer the policy relating to over income households.

CMHA is removing all current language from Section VI-B of the current Admissions and Continued Occupancy that outlines the continued eligibility of households with incomes above the HUD Low Income Limit. The following language will be adopted in the section pertaining to over income households:

*The federal Housing Opportunity through Modernization Act (HOTMA) of 2016 places an income limitation on public housing tenancy for families. Once a family's income has exceeded 120% of the Area Median Income (AMI), or a different limitation set by the Secretary of HUD ("over-income limit") for two consecutive years, CMHA may terminate the family's tenancy within six (6) months of the second income determination or charge the family a monthly rent equal to the greater of:*

- (1) The applicable Fair Market Rent (FMR) for the area; or*
- (2) The amount of monthly subsidy for the unit including amounts from the operating and capital fund, as determined by regulations.*

**Section III - Tenant Selection and Assignment Plan: 3. Debts Owed to CMHA**

CMHA is providing a method for applicant to redress their balances while allowing the applicants to continue through the application process.

2. CMHA will determine eligibility for the program. Applicants will retain their position on the site wait list selected until they reach the top of that list.

**Section II- Eligibility and Admissions and Processing of Applications: A. Organization of Waiting List**

CMHA further clarified the manner by which applicants are processed and offered CMHA residences.

**Debts Owed To CMHA:** If the applicant has a prior outstanding debt that is owed to CMHA , which would otherwise disqualify the applicant from housing, then CMHA may allow the applicant time to repay of this debt, while the application is processed by the Eligibility Department. The payment of the debt will be in accordance with the Bad Debt

# Summary of Proposed Changes to the 2020-21 Maintenance Charge Schedule

## **Maintenance Charge Schedule: A. Organization of Waiting List**

CMHA has not increased charges under its *Maintenance Charge Schedule* for the past five years. The charges under the schedule will reflect a ten (10%) percent adjustment to reflect increases in costs and labor