

**Summary of Proposed Changes to the HCV Administrative Plan
November 10, 2017**

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
Chapter 1: Overview of the Program and Plan				
1.	Updating and Revising the Plan	PHA	<ul style="list-style-type: none"> PHA will review and update the Administrative Plan as needed to reflect changes in regulations, MTW initiatives, PHA operations, or when needed to ensure staff consistency in operation. The original plan and any changes are approved by PHA's Board of Commissioners. PHA, from time to time, may make non-substantive changes and edits to the Administrative Plan to clarify policy language 	<ul style="list-style-type: none"> PHA will review and update the Administrative Plan as needed to reflect changes in regulations, MTW initiatives, PHA operations, or when needed to ensure staff consistency in operation. The original plan and any changes are approved by PHA's Board of Commissioners. PHA, from time to time, may make non-substantive changes and edits to the Administrative Plan to clarify policy language, address inconsistencies and simplify language.
2.	Identifying MTW Policies 1.6.2	PHA	<ul style="list-style-type: none"> Revised table to reflect updates to MTW policies 	<ul style="list-style-type: none"> Revised table to reflect updates to MTW policies
Chapter 3:				
3.	Notification to Applicants, Owners and Tenants about Protection Under VAWA 3.12.6	VAWA Final Rule	<ul style="list-style-type: none"> Correction concerning requirement for notification of VAWA Protections PHA will provide notice to applicants and tenants in assisted housing of protections provided under VAWA, in multiple languages when necessary, at the following junctures: <ul style="list-style-type: none"> At the time the applicant is denied; At the time the individual is admitted to a unit in an assisting housing program; At every regular recertification; With any notification of eviction or notification of termination of assistance. 	<ul style="list-style-type: none"> PHA will provide notice to applicants and tenants in assisted housing of protections provided under VAWA, in multiple languages when necessary, at the following junctures: <ul style="list-style-type: none"> At the time the applicant is denied; At the time the individual is admitted to a unit in an assisting housing program; With any notification of eviction or notification of termination of assistance.
Chapter 8 : Income and Adjusted Income				
4.	Annual Income 8.2	PHA	<ul style="list-style-type: none"> Added language to clarify existing regulations regarding what is included in annual income The full amount of <u>periodic</u> payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts (See Income Exclusions for treatment of delayed or 	<ul style="list-style-type: none"> The full amount of <u>periodic</u> payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts (See Income Exclusions for treatment of delayed or deferred periodic payment of social security or supplemental security income benefits); <ul style="list-style-type: none"> If an HCV family member is a payee for someone who is not a member of the HCV family, PHA will not include the payments in the calculation of annual income If someone outside the HCV family is a payee for one of the HCV family members, PHA will

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
			deferred periodic payment of social security or supplemental security income benefits);	include the payments in the calculation of annual income.
Chapter 10: Verification				
5.	Verification of Student Status & Income 10.27	PHA	<ul style="list-style-type: none"> Not currently included in the Plan 	<ul style="list-style-type: none"> PHA will consider full time student status as enrollment with a course load of 12 or more credit hours. Where an institution uses less than 12 hours as a standard for full time status, PHA will request and obtain third party verification to confirm full time student status.
Chapter 15: Payment Standards				
6.	Updating Payment Standards 15.2	24 CFR 982.503	<ul style="list-style-type: none"> PHA updates its payment standards in concert with the updates in fair market rent or at other times in order to ensure payment standards are consistent with market conditions. <p>If new fair market rents are published which cause any payment standard to be outside of the 90% to 110% range, PHA will implement the new payment standards prior to November 1st. PHA may change the payment standards at other times, but will maintain the payment standard between 90% and 110% of the FMR.</p> <p>If PHA has already processed recertifications that will be effective on or after the effective date of the new payment standard, PHA will not make retroactive adjustments for any such recertifications.</p>	<ul style="list-style-type: none"> PHA updates its payment standards in concert with the updates in fair market rent or at other times in order to ensure payment standards are consistent with market conditions. <p>PHA will update its payment standards amount no later than 3 months following the effective date of the published FMR</p> <p>If PHA has already processed recertifications that will be effective on or after the effective date of the new payment standard, PHA will not make retroactive adjustments for any such recertifications.</p>
7.	Utility Allowance Schedules 15.10	Correction	<ul style="list-style-type: none"> Removed incorrect policy PHA does not maintain a UA for tenant-supplied refrigerators since the majority of units in the HCV program are equipped with owner-supplied refrigerators. 	
8.	Alternate Utility Allowance Program 15.11	MTW Plan FY 2019	<ul style="list-style-type: none"> Not currently included in the Plan 	<ul style="list-style-type: none"> Upon HUD approval of the FY 2019 MTW Plan, PHA will further expand the utility allowance policy to require HCV tenants, whose incomes are at or below 150% of the Federal Poverty Level and who receive a utility allowance for water, to enroll and participate in the Philadelphia Water Departments Tiered Assistance Program (TAP). TAP provides customers with significant savings by offering a consistent bill based on their income. PHA will base the water utility allowance for eligible households on the amount charged under the TAP program. Water charges range from 2% to 3% of gross income
9.	Applying Utility Allowances	MTW Plan FY 2019	<ul style="list-style-type: none"> PHA's established utility allowance schedule is used in determining family share and PHA subsidy for all utilities, except in cases of the gas UA where the household is eligible for participation in the PGW Customer Responsibility Program (CRP). <p>PHA uses the lower of the actual unit size or voucher size to</p>	<ul style="list-style-type: none"> Revised policy to reflect addition of TAP program PHA's established utility allowance schedule is used in determining family share and PHA subsidy for all utilities, except in cases of the gas UA where the household is eligible for participation in the PGW Customer Responsibility Program (CRP) and/or water where the household is eligible for participation in Philadelphia Water Department's (PWD) TAP program

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
			<p>determine the utility allowance, except in cases of the gas UA.</p> <p>The utility allowance schedule that applies to a household at initial lease up is the utility allowance schedule in effect on the lease effective date.</p> <p>If the household is eligible for PGW's CRP program, the gas utility allowance that will be applied at initial lease up is the lower of the PGW capped gas charge or PHA's gas utility allowance schedule in effect on the lease effective date.</p> <ul style="list-style-type: none"> • 	<p>(TAP is pending HUD approval of the FY 2019 MTW Annual Plan).</p> <p>PHA uses the lower of the actual unit size or voucher size to determine the utility allowance, except in cases of the gas UA and water UA where the household is eligible for participation in PGW's CRP and/or PWD's TAP.</p> <p>The utility allowance schedule that applies to a household at initial lease up is the utility allowance schedule in effect on the lease effective date.</p> <p>If the household is eligible for PGW's CRP program, the gas utility allowance that will be applied at initial lease up is the lower of the PGW capped gas charge or PHA's gas utility allowance schedule in effect on the lease effective date.</p> <p>If the household is eligible for PWD's TAP program, the water utility allowance that will be applied at initial lease up is the lower of the TAP capped water charge or PHA's water utility allowance schedule in effect on the lease effective date.</p> <p>If the household is eligible for PWD's TAP program, the water utility allowance that will be applied at the time of certification (regular or interim) is the lower of the TAP capped water charge or PHA's water utility allowance schedule in effect on the certification effective date.</p>
Chapter 16: Continued Occupancy				
10.	Notification of and Participation in the Regular Recertification Process	PHA	<ul style="list-style-type: none"> • Not currently included in the Plan 	<ul style="list-style-type: none"> • PHA may adopt an on-line recertification process for all regular and interim recertifications. Policies will be updated to reflect this change when the on-line recertification process is implemented.
11.	Mail-In Recertification 16.8	PHA	<p>PHA completes mail-in reexaminations for certain targeted households. PHA sends a mail-in reexamination packet to the household, the household completes the forms in the packet and provides the required documents and then sends the packet back to PHA. PHA processes the reexamination and provides a PHA Rent Change Notice to the tenant and owner to advise them of their new rent and effective date.</p> <p>PHA will complete mail-in reexams for the following:</p> <ul style="list-style-type: none"> • Single adult households, regardless of income source or voucher size; and • Elderly households on fixed income who have one bedroom vouchers. 	<ul style="list-style-type: none"> • PHA completes mail-in reexaminations for certain targeted households in the Tenant-Based and Unit-Based programs. PHA may consider adopting mail-in recertifications for all assisted households. PHA, as a reasonable accommodation for a disabled individual, will provide alternate recertification procedures, if mail-in recertifications are not feasible for the disabled individual(s). PHA sends a mail-in reexamination packet to the household, the household completes the forms in the packet and provides the required documents and then sends the packet back to PHA. PHA processes the reexamination and provides a PHA Rent Change Notice to the tenant and owner to advise them of their new rent and effective date.
12.	Utility Allowance Schedule and Payment Standard at	MTW Plan FY 2019	<ul style="list-style-type: none"> • Households on the Alternate UA will have utility allowances updated at the time of interim recertification consistent with the 	<ul style="list-style-type: none"> • Households on the Alternate UA CRP and or TAP Programs will have utility allowances updated at the time of interim recertification consistent with the Alternate Utility Allowance Program

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
	Interim Recertification		Alternate Utility Allowance Program policies.	policies.
13.	Change in Household Composition 16.18.1	PHA	<ul style="list-style-type: none"> Removal of policy offering non-tenants reasonable accommodations. PHA may grant exceptions to this policy as a reasonable accommodation for a person with disabilities 	<ul style="list-style-type: none"> N/A
Chapter 17: Moving with Continued Assistance				
14.	Recertification of Household Income and Composition During Moves 17.5	PHA	For voluntary moves approved at the time of recertification, PHA will perform a new recertification. The next recertification due date will be changed to coincide with the new lease-up date. If the effective date of the last recertification is within 180 days of the request to move, PHA will not reverify income and/or expense information, unless the household reports a change in income and/or household composition.	<ul style="list-style-type: none"> For voluntary moves approved at the time of recertification, PHA will perform a new recertification. The next recertification due date will be changed to coincide with the new lease-up date. If the effective date of the last recertification is within 180 days of the request to move, PHA will not reverify income and/or expense information, unless the household reports a change in income and/or household composition. <p>For emergency moves approved under Appendix H of the Admin Plan, PHA will not perform a new recertification. These families will retain their existing recertification effective dates. However, if the family reports a change in income, PHA will complete a full recertification prior to voucher issue and the recertification date will be changed to coincide with the new lease-up date</p>
Chapter 18: Portability				
15.	Eligibility for Port Out 18.2.1	PHA MTW	<ul style="list-style-type: none"> Mobility Program was not included in the prior policy. 	<ul style="list-style-type: none"> Added policy clarification that prohibition on porting out does NOT apply to households in the Mobility Program
Chapter 20: Termination of Assistance & Tenancy				
16.	Household No Longer Requires Assistance	MTW Plan FY 2019	<ul style="list-style-type: none"> Not currently included in the Plan 	<ul style="list-style-type: none"> Upon HUD approval of the FY 2019 MTW Plan, PHA will implement a policy whereby the HAP contract terminates automatically 180 calendar days after the last housing assistance payment to the owner of \$50 or less. In this way, PHA will be able to provide assistance to a greater number of households by freeing up vouchers held by households with minimal assistance. <p>If a participating family with a HAP to owner of \$50 or less experiences a change in circumstances that would cause the HAP payment to rise above \$50, the family must notify PHA of the changed circumstances and request an interim recertification before the expiration of the 180-day period.</p>
Chapter 22: Special Programs & Allocations				
17.	Section 811 Initiative 22.14	PHA	<ul style="list-style-type: none"> Not currently included in the Plan 	<ul style="list-style-type: none"> PHA will commit 100 vouchers for extremely low income non-elderly person with serious mental disabilities who are served by the Pennsylvania Housing Finance Agency (PHFA) Section 811 Initiative. PHA has entered into an MOU with PHFA for provision of these vouchers <p>The Philadelphia Office of Homeless Services (OHS) works with the Regional Housing Coordinators (RHCs) to ensure proper referrals. PHA will accept referrals from the RHCs and will screen and process Section 811 referrals in the same manner as all voucher applicants. Families</p>

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
				with Section 811 vouchers are subject to all PHA MTW policies. The term of the MOU ends upon allocation of the agreed upon number of vouchers.
Chapter 23: Unit-Based Program				
18.	Budget Authority 23.2	Housing Opportunities Through Modernization Act HOTMA	<ul style="list-style-type: none"> PHA may select owner proposals to provide unit-based assistance for up to the amount of budget authority allocated to PHA by HUD in the PHA Voucher program. 	<ul style="list-style-type: none"> PHA may select owner proposals to provide unit-based assistance for up to 20 percent of PHA authorized units. Under the Housing Opportunity Through Modernization Act (HOTMA) PHA may unit-base an additional 10 percent of its units above the 20 percent program limit, provided the additional units fall into one of the following categories: <ul style="list-style-type: none"> Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11302) Are specifically made available to house families that are comprised of or include a veteran.- <i>Veteran</i> means an individual who has served in the United States Armed Forces. Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403 Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.
19.	VASH, FUP and UBV Assistance 23.10	HOTMA	<ul style="list-style-type: none"> Not currently included in the Plan 	<ul style="list-style-type: none"> Under the Housing Opportunity through Modernization Act (HOTMA), PHA may unit-base HUD VASH and FUP vouchers without additional requirements for approval by HUD.
20.	Cap on Number of UBV Units in Each Building	MTW	<ul style="list-style-type: none"> Clarified MTW Policy to reflect removal of ceiling for number of units in a development which can be unit based. 	<ul style="list-style-type: none"> PHA may unit-base up to 100 percent of the dwelling units in any UBV project or building selected in accordance with one of the selection methods set forth in the section on "Owner Selection Procedures" <p>If the project has a supportive services requirement, participating households must adhere to the supportive service requirements.</p>
21.	Definition of Project 23.22.1	MTW Plan FY 2019	<ul style="list-style-type: none"> A <i>single-family</i> property is a single project containing one to four family <i>dwelling units</i>. A "project" is defined as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. 	<ul style="list-style-type: none"> A project is a single building, multiple contiguous or non-contiguous buildings, or multiple buildings on contiguous or non-contiguous parcels of land. A single family building is a building with no more than four dwelling units.
22.	Term of the HAP Contract 23.22.3	HOTMA	<ul style="list-style-type: none"> PHA may enter into a HAP contract with an owner for an initial term of no less than one year and no more than fifteen years. The term of all UBV HAP contracts will be negotiated with the owner on a case-by-case basis 	<ul style="list-style-type: none"> PHA may enter into a HAP contract with an owner for an initial term of no less than one year and no more than twenty years. The term of all UBV HAP contracts will be negotiated with the owner on a case-by-case basis
23.	HAP Contract Extension 23.22.4	HOTMA	<ul style="list-style-type: none"> Prior to expiration of the HAP contract, PHA may extend the term of the contract for an additional term of up to fifteen years if PHA 	<ul style="list-style-type: none"> Prior to expiration of the HAP contract, PHA may extend the term of the contract for an additional term of up to twenty years if PHA determines an extension is appropriate to continue providing

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
			determines an extension is appropriate to continue providing affordable housing for low-income households. All extensions are subject to funding availability and the conditions prescribed by PHA at the time of the extension. When determining whether or not to extend an expiring UBV contract, PHA will consider whether such extension is in the interests of PHA and its low-income households.	affordable housing for low-income households. All extensions are subject to funding availability and the conditions prescribed by PHA at the time of the extension. When determining whether or not to extend an expiring UBV contract, PHA will consider whether such extension is in the interests of PHA and its low-income households.
24.	Alternative System for Determining Reasonable Rent for PBV Scattered Sites 23.55.1	MTW Plan FY 2019	<ul style="list-style-type: none"> Not currently included in the Plan 	<ul style="list-style-type: none"> Upon approval of PHA's FY 2019 MTW Plan, PHA will develop an alternate system for reasonable rent (RR) determinations for PBV single scattered site projects covered by a single HAP contract within the same sub-market area. PHA will determine the sub-market for the project and where both the sub-market and bedroom sizes are the same, PHA will conduct one RR determination for units of the same size. For example, if PHA provides a PBV subsidy to 7 scattered site/buildings within the same project covered by a single HAP contract each with two and three bedroom units in the Germantown section of Philadelphia, PHA will conduct one RR determination for all of the two bedroom units and one RR determination for all of the three BR units
25.	UBV & Applicable MTW Policies 23.66	MTW Plan	<ul style="list-style-type: none"> Not current included in the Plan. 	<ul style="list-style-type: none"> Applies the following policy to the UBV program: Rent Simplification as noted in Error! Reference source not found. Error! Reference source not found.
Chapter 24: Rental Assistance Demonstration Program				
26.	Rent Simplification 24.5.3	PHA	<ul style="list-style-type: none"> PHA will not apply the MTW authorized Rent Simplification policies from the TBV program to the RAD program with the exception of biennial and triennial recertifications, the limit on interim recertifications and the asset verification and calculation policy. Households that reside in tax credit properties will continue to be subject to annual income certifications. Conversion Household that qualify for a phase-in of their rent will be recertified on an annual basis until they pay the full standard TTP. See Error! Reference source not found. for rent simplification policies. TW biennial and triennial recertification policies and Asset policies 	<ul style="list-style-type: none"> PHA will apply the MTW authorized Rent Simplification policies from the TBV program to the RAD program. Households that reside in tax credit properties will continue to be subject to annual tax credit income certifications. Conversion Household that qualify for a phase-in of their rent will be recertified on an annual basis until they pay the full standard TTP. See Error! Reference source not found. rent simplification policies.

No	Chapter Name Subject Area	Source	Existing Admin Plan	Proposed Admin Plan
27.	Recertification 24.9.1	PHA	<ul style="list-style-type: none"> • RAD tenants will be recertified according to PHA's UBV policies and schedule. PHA will establish a recertification month for each project at which time all of the households will be recertified in accordance with their biennial or triennial schedule. . Conversion Households that were relocated due to the RAD conversion will be recertified prior to lease up at the project. Conversion Households that elect to have their rent increase phased-in will be recertified on an annual basis until the family pays their full standard TTP. New Households will be recertified according to their project's recertification month regardless of when they move into the project. 	<ul style="list-style-type: none"> • RAD tenants will be recertified according to PHA's UBV policies and schedule. Generally, recertification effective dates will coincide with either the lease anniversary date or an established recertification month for the project at which time all of the households will be recertified in accordance with their biennial or triennial schedule. Conversion Households that elect to have their rent increase phased-in will be recertified on an annual basis until the family pays their full standard TTP. New Households will be recertified according to their project's recertification month regardless of when they move into the project.