



Proposed Administrative Plan Change Summary
May 14, 2020

Plan Location	Description	Comments
Global Changes	The document was changed throughout to reflect the rebranding of the Charlotte Housing Authority. All references (i.e. "The Housing Authority of the City of Charlotte", "CHA", "the Charlotte Housing Authority" or "Charlotte Housing Authority") have been changed to INLIVIAN	
Global Changes	The document has been changed throughout to reflect an MTW initiative extending the valid lifetime of verifications for new admissions from 60 days to 180 days and the valid lifetime of verifications of clients completing the recertification process from 120 days to 180 days.	Implementation is dependent upon MTW approval
Global Changes	The document has been changed throughout to reflect an MTW initiative to extend the modified terms of an over subsidy exception for Rental Assistance Demonstration (RAD) sites that was established for households living at the sites at the time of RAD conversion to new admissions.	Implementation is dependent upon MTW approval

Page	Change	Clarification
Chapter 3 Eligibility		
3-5	<p>INLIVIAN POLICY</p> <p>If the Head of Household leaves the assisted unit voluntarily, other adult family members shall not be considered remaining family members and housing assistance shall not be continued. This shall be considered voluntarily relinquishing of voucher and is not subject to informal hearing procedures.</p> <p>In the event of the death of the head of household, INLIVIAN may allow the assistance to be transferred to an adult remaining member of the tenant family.</p>	
Chapter 4 Applications, Waiting List and Tenant Selection		
4-10	<p>Local Preferences [24 CFR 982.207; HCV p. 4-16]</p> <p>PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources.</p> <p>CHAINLIVIAN Policy</p> <p>Effective September 18, 2019, CHA's applicants will maintain their existing preference permanently until they are pulled from the waiting list. Also effective September 18, 2019, CHA will use the following local preferences</p> <p>1. Date and time of application.</p> <p>INLIVIAN Policy</p>	

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	<p>Applicants on the INLIVIAN waiting list will be selected from the waiting list in the following order.</p> <ol style="list-style-type: none"> 1. Families who are being displaced by property/properties owned by INLIVIAN and/or its affiliates due to recapitalization. 2. Preference <p>Effective September 18, 2019, INLIVIAN eliminated the following preferences as part of the selection order. Any applicant still on the waiting list that has one of the preferences listed below at the time of the policy change will be pulled from the waiting list according to that preference in the following order.</p> <ol style="list-style-type: none"> 1. Homeless Families participating in a self-reliance, supportive service program that assists families in a shelter or in short term transitional housing programs. 2. Veteran Families. 3. Working Families. The CHA will establish a preference for “working” families, where the head, spouse, co-head, or sole member is employed at least 15 hours per week, participating in an economic self-sufficiency program, full time students in a job training or accredited institution, receiving unemployment benefits or actively seeking work. As required by HUD, families where the head and spouse, or sole member is a person age 62 or older, or is a person with disabilities, will also be given the benefit of the working preference [24 CFR960.206(b)(2)].982.207(b)(2) 4. Near Elderly 5. Domestic Violence Victims 	

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4-14	<p>3 Date and time of application</p> <p>4-III.F. COMPLETING THE APPLICATION PROCESS</p> <p>The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.</p> <p>CHAINLIVIAN Policy</p> <p>If the CHAINLIVIAN determines that the family is ineligible, the CHAINLIVIAN will send written or electronic notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review (Chapter16).</p> <p>If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low- income), the family will be returned to its original position on the waiting list. The CHAINLIVIAN will notify the family in writing that it has been returned to the waiting list and will specify the reasons for it.</p> <p>INLIVIAN believes that families need to be prepared for success and becoming self-sufficient. To this end, families selected from the waiting list may go through a training program before they can receive a voucher. If the family is determined eligible, they will be contacted to attend the orientation program. Upon completion of the orientation, the family will be issued a voucher if one is available</p>	Implementation is dependent upon MTW approval

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Chapter 6 Income and Subsidy Determinations		
6-20	<p><i>Checking and Savings Accounts</i></p> <p>For regular checking accounts and savings accounts, <i>cash value</i> has the same meaning as <i>market value</i>. If a checking account does not bear interest, the anticipated income from the account is zero.</p> <p><u>CHAINLIVIAN Policy</u></p> <p>In determining the value of a checking account, the CHAINLIVIAN will use the average monthly balance for the last two months <u>based on current bank statements or third party verification</u>. <u>For continuing assistance if the assets total less than \$5,000 the applicant/participant will self-certify their assets.</u></p> <p><u>For new admissions: In determining the value of a checking account, INLIVIAN will use the average monthly balance for the last two months based on current bank statements or third party verification. For savings accounts, INLIVIAN will obtain one current bank statement. If a current bank statement is unavailable third party verification will be obtained .</u></p>	
Chapter 8 Uniform Physical Condition Standards and Rent Reasonableness		
8-18	<p><u>If a tenant based unit passes an initial inspection, the results are valid for a sixty (60) calendar days. The lease start date of the assisted unit must fall within this period. If the lease term will start later than (60) days after the unit passes inspection, the unit must be reinspected and pass prior to first day of the HAP Contract.</u></p>	

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Chapter 10 Moving With Continued Assistance and Portability		
10-5	<p>CHAINLIVIAN Policy</p> <p>The CHAINLIVIAN will deny a participant permission to make an elective move during any 18-month period unless the situation involves a mandatory or permissible move.</p> <p><u>Mandatory:</u></p> <ul style="list-style-type: none"> • Abatement (if there are no outstanding participant violations) • Breach of contract by owner • Domestic Violence • Transfer of ownership where new owner is not participating in the HCV program • Underhoused • Natural disasters or accidents at no fault of the participant family that make the unit uninhabitable <p><u>Permissible:</u></p> <ul style="list-style-type: none"> • Reasonable Accommodations • Health or safety of a family member (e.g. lead-based paint hazards, domestic violence, and witness protection programs), or to address an emergency situation over which a family has no control. • Notice of pending foreclosure • Decrease in payment standard • Educational opportunities • Employment opportunities • Homeownership opportunities with INLIVIAN's homeownership program 	

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Chapter 11 Reexaminations		
11-2	<p>11-I.B.SCHEDULING ANNUAL REEXAMINATIONS</p> <p>The PHA must establish a policy to ensure that the annual reexamination for each family is completed <i>within</i> a 12-month period and may require reexaminations more frequently [HCV GB p.12-1].</p> <p><u>CHAINLIVIAN Policy</u></p> <p>The <u>CHAINLIVIAN</u> will perform triennial reexaminations for elderly/disabled <u>all</u> families and biennial reexaminations for all other families. When a family is due, <u>the CHAINLIVIAN</u> will begin the regularly scheduled reexamination process 120 days in advance of its scheduled effective date.</p> <p><i>Anniversary date</i> is defined as 36<u>24</u> months from the effective date of the family's last annual reexamination or, during a family's second year in the program, from the effective date of the family's initial examination (admission).</p> <p><u>The CHAINLIVIAN</u> also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.</p> <p>Notification of and Participation in the <u>Biennial</u> Reexamination Process</p> <p>The PHA is required to obtain the information needed to conduct <u>biennial</u> reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].</p>	Approved MTW Initiative-technical amendment related to COVID 19
11-3 to 11-4	<p>11-I.C.CONDUCTING <u>BIENNIAL</u> REEXAMINATIONS</p> <p>As part of the <u>biennial</u> reexamination process, families are required to provide updated information to the PHA regarding the family's income, expenses, and composition [24 CFR 982.551(b)].</p> <p><u>CHAINLIVIAN Policy</u></p>	

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	<p>Families will be asked to return all required information (as described in the reexamination notice) by the required due date. The required information will include a CHAINLIVIAN-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family’s income, expenses, and family composition.</p> <p>Any required documents or information that the family is unable to provide at the time of the requested date must be provided within 10 business days of the request. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be sent a notice of termination (See Chapter 12).</p> <p>The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re- verified on a triennial-biennial basis. These include:</p> <ul style="list-style-type: none"> • Legal Identity • Age • Social security numbers • Citizenship or immigration status <p>11-I.D. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS [24 CFR 982.552(b)(5)]</p> <p>Section 327 of Public Law 109-115 established new restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.</p>	

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	<p>If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student’s eligibility must be reexamined along with the income eligibility of the student’s parents on a triennial <u>biennial</u> basis. In these cases, both the student and the student’s parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from his or her parents in accordance with INLIVIAN policy, the income of the student’s parents will not be considered in determining the student’s ongoing eligibility.</p> <p>11-I.E. EFFECTIVE DATES</p> <p>The PHA must establish policies concerning the effective date of changes that result from a <u>biennial</u> reexamination [24 CFR 982.5 16].</p>	
11-6	<p>PART II: INTERIM REEXAMINATIONS</p> <p>[24 CFR 982.516]</p> <p>11-II.A. OVERVIEW</p> <p>Family circumstances may change throughout the period between <u>biennial</u> reexaminations. HUD and CHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the <u>CHAINLIVIAN</u> must process interim reexaminations to reflect those changes. HUD regulations also permit the <u>CHAINLIVIAN</u> to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10].</p>	
11-7 moved to 11-10	<p><u>CHAINLIVIAN</u> Policy</p> <p>The <u>CHAINLIVIAN</u> will require a family to report all changes in within 10 business days of the change that occur between regularly scheduled reexaminations. In both traditional voucher and project-based (excluding PBV’s with FSS components), <u>CHAINLIVIAN</u> will not process interim reexaminations 3 months prior to a regularly</p>	

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	scheduled recertification, 3 months after a regularly scheduled recertification or within 3 months after a lease up when there is a loss of income (except in cases of extenuating circumstances) for work-abled households.	
11-12	<p style="text-align: center;">PART III: RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT</p> <p>11-III.A. OVERVIEW</p> <p>After gathering and verifying required information for a regularly schedule reexamination biennial or interim reexamination, the PHA must recalculate the family share of the rent and the subsidy amount, and notify the family and owner of the changes [24 CFR 982.516(d)(2), HCV GB 12-6 and 12-10]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.</p>	
11-13	<p>INLIVIAN POLICY</p> <p>INLIVIAN may make necessary adjustments to the frequency of setting payment standards and rent increases due to INLIVIANs increased time between re-examinations.</p>	
11-14	<p>INLIVIANCHA Policy</p> <p>Revised utility allowances will be applied to a family’s rent and subsidy calculations at the next regularly scheduled biennial reexamination after the allowance is adopted.</p>	
11-14	<p>11-III.C. NOTIFICATION OF NEW FAMILY SHARE AND HAP AMOUNT</p> <p>The PHA must notify the owner and family of any changes in the amount of the HAP payment [HUD-52641, HAP Contract]. The notice must include the following information [HCV GB, p. 12-6]:</p> <p>The amount and effective date of the new HAP payment</p>	

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	<p>The amount and effective date of the new family share of the rent</p> <p>The amount and effective date of the new tenant rent to owner</p> <p>The family must be given an opportunity for an informal hearing regarding the PHA’s determination of their annual or adjusted income, and the use of such income to compute the housing assistance payment [24 CFR 982.555(a)(1)(i)] (see Chapter 16).</p> <p>INLIVIANCHA Policy</p> <p>The notice to the family will include the <u>biennial</u>/triennial and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment. The notice also will state the procedures for requesting an informal hearing.</p>	
Chapter 13 Owners		
13-3	<p>INLIVIAN has been approved through the agency’s MTW authority to implement a Housing Provider Incentive Program. This program has been implemented to retain and recruit Housing Providers. Incentives will be contingent upon funding availability</p>	
Chapter 14 Program Integrity		
14-3	<p>Quality Control and Analysis of Data</p> <p>Under the Section 8 Management Assessment Program (SEMAP), HUD requires the PHA to review a random sample of tenant records annually to determine if the records conform to program requirements and to conduct quality control inspections of a sample of units to ensure HQS/UPCS compliance [24 CFR, Part 985]. (See Chapter 16 for additional</p>	

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	<p>information about SEMAP requirements).</p> <p><u>INLIVIAN Policy</u></p> <p>SEMAP will only be used as an internal quality control to ensure method to detect errors and program abuse.</p> <p>INLIVIAN routinely will use available sources of up-front income verification, including HUD’s EIV system, to compare with family- provided information.</p> <p>At each biennial <u>regularly scheduled</u> -reexamination, current information provided by the family will be compared to information provided at the last reexamination to identify inconsistencies and incomplete information.</p>	
Appendix A		
	<p><u>Emergency Policies in to Response to COVID 19</u></p>	
Glossary		
	<p><u>CHA Housing Authority of the City of Charlotte, NC</u></p>	
	<p><u>INLIVIAN – Formerly the Housing Authority of the City of Charlotte</u></p>	