

San Diego Housing Commission
Summary of Revisions to the Section 8 Administrative Plan

Attachment 2

Current	Revision	Explanation
<p><u>Verification, Income, Assets and Allowances</u> Chapter 3, page 2</p> <p>SDHC will utilize up-front income verification (UIV) whenever possible. UIV is income information that is available through an independent source that systematically and uniformly maintains income information in computerized form for a large number of individuals, such as HUD's Tenant Assessment Subsystem (TASS), EDD and the Work Number.</p> <p>When HUD announces the availability of the UIV system for SDHC, SDHC will utilize additional UIV tools, including a centralized computer matching system. SDHC will pursue other computer matching agreements with federal, state, and local government agencies.</p>	<p><u>Verification, Income, Assets and Allowances</u> Chapter 3, page 2</p> <p>SDHC will utilize up-front income verification (UIV) whenever possible. UIV is income information that is available through an independent source that systematically and uniformly maintains income information in computerized form for a large number of individuals, such as HUD's Enterprise Income Verification System (EIV) and the Work Number.</p> <p>SDHC currently utilizes HUD's Enterprise Income Verification System (EIV) which is a computer matching program, UIV tool. SDHC will pursue other computer matching agreements with federal, state, and local government agencies.</p>	<p>Enterprise Income Verification System (EIV) is a HUD computer match program for the purpose of verifying the employment & income of tenants</p>
<p><u>Social Security and Supplemental Security Income</u> Chapter 3, page 15</p> <p>Acceptable methods of verification include, in order of priority:</p> <ol style="list-style-type: none"> 1. TASS (UIV) for Social Security and Supplemental Security Income in conjunction with award letter or print-out. 	<p><u>Social Security and Supplemental Security Income</u> Chapter 3, page 15</p> <p>Acceptable methods of verification include, in order of priority:</p> <ol style="list-style-type: none"> 1. EIV (UIV) for Social Security and Supplemental Security Income in conjunction with award letter or print-out. 	<p>Language changed from TASS to EIV</p>
<p><u>Unemployment Compensation</u> Chapter 3, page 15</p> <p>Acceptable methods of verification include, in order of priority:</p> <ol style="list-style-type: none"> 1. Upfront verification through EDD. 	<p><u>Unemployment Compensation</u> Chapter 3, page 15</p> <p>Acceptable methods of verification include, in order of priority:</p> <ol style="list-style-type: none"> 1. Upfront verification through EIV. 	<p>Language changed from EDD to EIV</p>

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<p><u>Verification, Income, Assets and Allowances</u> Chapter 3, page 18</p> <p>Full-time Student Status</p> <p>Only the first \$480 of the earned income of full-time students, other than head, spouse, or co-head, will be counted towards family income.</p> <p>Financial aid, scholarships and grants received by full time students are not counted towards family income.</p> <p>Verification of full time student status includes:</p> <ol style="list-style-type: none"> 1. Written verification from the registrar's office or other school official. 2. School records indicating enrollment for sufficient number of credits to be considered a full-time student by the educational institution. 	<p><u>Verification, Income, Assets and Allowances</u> Chapter 3, page 18</p> <p>Student Financial Assistance - New Rule</p> <p>The San Diego Housing Commission will abide by HUD's Final Rule on Student Financial Assistance in accordance with [24CFR 5.609 (b)(9) and FR 4/10/2006]</p> <p>Financial assistance will be included in annual income to determine financial eligibility for the following students:</p> <p>Students who are enrolled in an institution of higher education, as defined under the Higher Education Act (HEA) of 1965, and are:</p> <p>Under the age of 24 Not a veteran Unmarried Do not have any children, and The student has not established their own household for a minimum of not less than one year, and are <u>not</u> included on their parent's last year's tax return.</p> <p>Student financial assistance in excess of tuition received: 1) under the 1965 HEA, 2) from a private source, or 3) from an institution of higher education, as defined under the 1965 HEA, will be included in annual income.</p> <p>Student Financial Assistance <u>Excluded</u> from Annual Income [24 CFR 5.609©(6)]</p> <p>Any student financial assistance not subject to inclusion is fully excluded from annual income whether it is paid directly to the student or to the education institution the student is attending. This includes any financial assistance received by:</p> <p>Students residing with parents who are seeking or receiving Section 8 assistance</p>	<p>New Rule effective December 30, 2005</p>

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	<p>Students who are enrolled in an educational institution that does not meet the 1965 HEA definition of institution of higher education</p> <p>Students who are over 23 AND have at least one dependent child.</p> <p>Students who are receiving financial assistance through a governmental program not authorized under the 1965 HEA.</p> <p>Only the first \$480 of the earned income of full-time students, other than head, spouse, or co-head, will be counted towards family income.</p>	
<p><u>Owner Rents, Rent Reasonableness and Payment Standards</u> Chapter 9, page 3</p> <p>Rent Reasonableness Methodology</p> <p>At initial move-in and subsequent moves, the owner completes the HUD Form, Request for Tenancy Approval, including the section of the form listing the most recently leased comparable unassisted units within the premises.</p>	<p><u>Owner Rents, Rent Reasonableness and Payment Standards</u> Chapter 9, page 3</p> <p>Rent Reasonableness Methodology</p> <p>At initial move-in and subsequent moves, the owner completes the Request for Tenancy Approval, including the section of the form listing the most recently leased comparable unassisted units within the premises.</p>	<p>Removal of language: HUD Form</p>
<p><u>Housing Quality Standards and Inspections</u> Chapter 10, page 4</p> <p><u>Modifications</u></p> <p>Modifications or adaptations to a unit due to a disability must meet all applicable HQS and owner may be required to provide copies of permits when requested.</p>	<p><u>Housing Quality Standards and Inspections</u> Chapter 10, page 4</p> <p><u>Modifications</u></p> <p>Modifications or adaptations to a unit must meet all applicable HQS and be permitted by the city of San Diego. The owner may be required to provide copies of permits when requested.</p>	<p>Clarification to current policy</p>

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<p><u>Abatement</u> Chapter 10, page 5</p> <p>If the owner makes repairs during the abatement period, payment will resume on the day the unit passes inspection.</p> <p>The family and owner will be notified of the reinspection date.</p>	<p><u>Abatement</u> Chapter 10, page 5</p> <p>If the owner makes repairs during the abatement period, payment will resume on the day the SDHC is notified of the repairs as long as the unit passes inspection on the scheduled date.</p> <p>If the unit is in abatement status only the owner or manager may cancel or reschedule the inspection. The family and owner will be notified of the reinspection date.</p>	<p>Clarification to current policy</p> <p>Clarification to current policy</p>
<p><u>Program Terminations and Program Integrity Unit</u> Chapter 11, page 9</p> <p><u>HOUSING COMMISSION POLICY FOR CONSIDERATION OF CIRCUMSTANCES</u></p> <p>In deciding whether to deny or terminate assistance because of action or failure to act by members of the family, the Housing Commission has discretion to consider all of the circumstances in each case, including the seriousness of the violation. The Housing Commission will use its discretion in reviewing the extent of participation or culpability of individual family members and the length of time since the violation occurred. The Housing Commission may also review the family's more recent history and record of compliance, and the effects that denial or termination of assistance may have on other family members who were not involved in the action or failure to act.</p>	<p><u>Program Terminations and Program Integrity Unit</u> Chapter 11, page 9</p> <p><u>HOUSING COMMISSION POLICY FOR CONSIDERATION OF CIRCUMSTANCES</u></p> <p><u>Violence Against Women</u> The San Diego Housing Commission will comply with the Violence Against Women Act (VAWA) as signed in to law on January 5, 2006.</p> <p>SDHC will follow HUD's requirements as established in the regulation.</p> <p>The new law states that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking, will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence, and will not be good cause for terminating the assistance, tenancy or occupancy rights of the victim of such violence.</p> <p>Criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of assistance, tenancy, or occupancy rights, if the tenant or an</p>	<p>New Law effective January 5, 2006</p>

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<p><u>PAYMENT PLAN AGREEMENT FOR FAMILIES</u> Chapter 11, page 13</p> <p>If the family's Payment Plan Agreement is in arrears, the Housing Commission may:</p> <p>Require the family to pay the balance in full; and/or</p> <p>Pursue civil collection of the balance due; and/or</p> <p>Terminate the housing assistance.</p> <p><u>DEBTS DUE TO NON-REPORTING OF INFORMATION</u> Chapter 11, page 13</p> <p>Families who owe money to the Housing Commission due to the family's failure to report accurate and complete information will</p>	<p>immediate family member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence or stalking.</p> <p>Other Circumstances</p> <p>In deciding whether to deny or terminate assistance because of action or failure to act by members of the family, the Housing Commission has discretion to consider all of the circumstances in each case, including the seriousness of the violation. The Housing Commission will use its discretion in reviewing the extent of participation or culpability of individual family members and the length of time since the violation occurred. The Housing Commission may also review the family's more recent history and record of compliance, patterns of providing false information and the effects that denial or termination of assistance may have on other family members who were not involved in the action or failure to act.</p> <p><u>PAYMENT PLAN AGREEMENT FOR FAMILIES</u> Chapter 11, page 13</p> <p>Families who owe money to the SDHC will be required to repay in accordance with the Payment Plan Agreement. The family's payment plan agreement may:</p> <p>Require the family to pay the balance in full; and/or</p> <p>Pursue civil collection of the balance due; and/or</p> <p>Pursue federal and state tax income tax refunds from families who have unpaid balances and/or</p> <p>Terminate the housing assistance.</p> <p><u>DEBTS DUE TO NON-REPORTING OF INFORMATION</u> Chapter 11, page 13</p> <p>SDHC will terminate assistance and will consider all circumstances in each case, including the seriousness of the violation. SDHC will use its</p>	<p>Change adds new language; include patterns of providing false information.</p> <p>Change adds new language to pursue tax set-off programs for unpaid balances.</p> <p>Change adds new language to clarify</p>

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<p>be required to repay in accordance with the Payment Plan Agreement.</p> <p><u>OWNER DEBTS TO THE HOUSING COMMISSION</u> Chapter 11, page 14</p> <p>If the Housing Commission determines that the owner has retained Housing Assistance Payments or claim payments the owner is not entitled to, the Housing Commission may reclaim the amounts from future Housing Assistance Payments or claim payments owed the owner for any other units under contract.</p> <p>If future Housing Assistance or Claim Payments are insufficient to reclaim the amounts owed, the Housing Commission will:</p> <p>Require the owner to pay the amount in full; and/or</p> <p>Enter into a Payment Agreement with the owner for the amount owed; and/or</p> <p>Pursue collections through public or private agencies; and/or</p> <p>Restrict the owner from future participation.</p>	<p>discretion in reviewing the extent of participation or culpability of individual family members and the length of time since the violation occurred.</p> <p><u>OWNER DEBTS TO THE HOUSING COMMISSION</u> Chapter 11, page 14</p> <p>If the Housing Commission determines that the owner has retained Housing Assistance Payments or claim payments the owner is not entitled to, the Housing Commission may reclaim the amounts from future Housing Assistance Payments or claim payments owed the owner for any other units under contract.</p> <p>If future Housing Assistance or Claim Payments are insufficient to reclaim the amounts owed, the Housing Commission will:</p> <p>Require the owner to pay the amount in full; and/or</p> <p>Enter into a Payment Agreement with the owner for the amount owed; and/or</p> <p>Pursue collections through public or private agencies; and/or</p> <p>Restrict the owner from future participation.</p> <p>Amounts under \$500 that are owed to the SDHC, and disputed by an owner may be disregarded at the discretion of SDHC to avoid administrative burden.</p>	<p>policy on debts due to non reporting accurate information</p> <p>Change allows for write-off of debt to avoid administrative burden.</p>
<p><u>CLAIMS AND VACANCY LOSS</u> Chapter 13, page 2</p> <p>The owner has up to one year from the move-out date, to submit a claim for vacancy loss.</p> <p><u>Vacancy Loss</u></p>	<p><u>CLAIMS AND VACANCY LOSS</u> Chapter 13, page 2</p> <p>The owner has up to three (3) months from the move-out date, to submit a claim for vacancy loss.</p> <p><u>Vacancy Loss</u></p>	<p>Language changed to reduce time for owners claiming vacancy loss.</p>

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<p>Chapter 13, page 7</p> <p>The owner has up to six months from the move out date to submit a claim for vacancy loss.</p>	<p>Chapter 13, page 7</p> <p>The owner has up to three (3) months from the move-out date to submit a claim for vacancy loss.</p>	<p>Language changed to reduce time for owners claiming vacancy loss.</p>
<p><u>Glossary</u> Chapter G1-1</p> <p>Acronyms in Subsidized Housing</p> <p>EIV None existed.</p> <p>TASS HUD's Tenant Assessment Subsystem</p>	<p><u>Glossary</u> Chapter G1-1</p> <p>Acronyms in Subsidized Housing</p> <p>EIV Enterprise Income Verification System. HUD's computer matching up front verification (UIV) tool between HUD, Health & Human Services (HHS) and Social Security Administration (SSA)</p> <p>Deleted</p>	<p>New acronym.</p>

Capital Fund Program Five-Year Action Plan

Part I: Summary

PHA Name SAN DIEGO HOUSING COMMISSION						<input checked="" type="checkbox"/> Original 5-Year Plan	<input type="checkbox"/> Revision No.
Development Number/Name/HA- Wide	Year 1	Work Statement for Year 2 FFY Grant: 2008 PHA FY: 2008	Work Statement for Year 3 FFY Grant: 2009 PHA FY: 2009	Work Statement for Year 4 FFY Grant: 2010 PHA FY: 2010	Work Statement for Year 5 FFY Grant: 2011 PHA FY: 2011		
	Annual Statement						
016-013		\$ 208,800.00	\$ 379,690.00	\$ 226,680.00	\$ 749,880.00		
016-014		\$ 326,000.00	\$ 203,196.00	\$ 52,930.00	\$ 579,638.00		
016-015		\$ 61,200.00	\$ 8,700.00	\$ 45,700.00	\$ 5,500.00		
016-016		\$ 33,000.00	\$ 15,448.00	\$ 29,500.00	\$ 9,000.00		
016-017		\$ 18,000.00	\$ 2,600.00	\$ -	\$ 2,600.00		
016-018		\$ 83,200.00	\$ 310,700.00	\$ 22,800.00	\$ 284,200.00		
016-019		\$ 23,400.00	\$ 24,050.00	\$ 176,800.00	\$ 24,050.00		
016-020		\$ 28,000.00	\$ 22,240.00	\$ 39,400.00	\$ 10,400.00		
016-021		\$ 32,000.00	\$ 74,500.00	\$ 47,150.00	\$ 81,500.00		
016-022		\$ 32,000.00	\$ 19,800.00	\$ 103,200.00	\$ 29,000.00		
016-023		\$ 48,000.00	\$ 45,360.00	\$ 105,400.00	\$ 14,500.00		
016-024		\$ 72,000.00	\$ 7,750.00	\$ 67,800.00	\$ 2,880.00		
016-025		\$ 57,200.00	\$ 9,774.00	\$ -	\$ 12,114.00		
016-026		\$ 44,000.00	\$ 8,500.00	\$ 49,800.00	\$ 8,500.00		
016-027		\$ 14,400.00	\$ 121,800.00	\$ 25,000.00	\$ 24,300.00		
016-028		\$ 105,600.00	\$ 51,600.00	\$ 45,346.00	\$ 63,700.00		
016-030		\$ 64,000.00	\$ 432,000.00	\$ -			
016-031		\$ 38,000.00	\$ 8,326.00	\$ -	\$ 16,866.00		
016-032		\$ 80,000.00	\$ 16,300.00	\$ 42,500.00	\$ 16,300.00		
016-033		\$ 98,000.00	\$ 80,800.00	\$ 290,000.00	\$ 31,400.00		
016-034		\$ 41,600.00	\$ -	\$ -	\$ -		
016-035		\$ 160,000.00	\$ 261,360.00	\$ 346,120.00	\$ 185,285.00		
016-037		\$ 48,000.00	\$ 9,250.00	\$ 324,000.00	\$ 9,250.00		
016-038		\$ 140,000.00	\$ 20,100.00	\$ 110,800.00	\$ 114,500.00		
016-039		\$ 100,000.00	\$ 20,800.00	\$ 21,000.00			
016-040		\$ 51,200.00	\$ 25,500.00	\$ 117,900.00	\$ 25,500.00		
016-043		\$ 22,000.00	\$ 8,640.00	\$ 29,200.00	\$ 17,200.00		
016-044		\$ 94,000.00	\$ 37,800.00	\$ 19,600.00	\$ 11,000.00		
016-046		\$ 14,000.00	\$ 5,900.00	\$ 5,000.00	\$ 5,900.00		
016-047		\$ 90,000.00	\$ 105,050.00	\$ 70,000.00	\$ 138,850.00		

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Part I: Summary

PHA Name SAN DIEGO HOUSING COMMISSION						<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No.
Development Number/Name/HA- Wide	Year 1	Work Statement for Year 2 FFY Grant: 2008 PHA FY: 2008	Work Statement for Year 3 FFY Grant: 2009 PHA FY: 2009	Work Statement for Year 4 FFY Grant: 2010 PHA FY: 2010	Work Statement for Year 5 FFY Grant: 2011 PHA FY: 2011	
	Annual Statement					
016-048		\$ 10,000.00	\$ 1,950.00	\$ 24,000.00	\$ 2,500.00	
016-049		\$ 86,000.00	\$ 24,610.00	\$ 51,600.00	\$ 45,910.00	
016-050		\$ 84,000.00	\$ 7,500.00	\$ 49,400.00	\$ 100,000.00	
016-055		\$ 64,000.00	\$ 1,300.00	\$ 244,250.00	\$ 3,800.00	
016-057		\$ 16,000.00	\$ 13,900.00	\$ -		
016-058		\$ 56,000.00	\$ 23,700.00	\$ 24,000.00	\$ 120,000.00	
016-059		\$ 84,000.00	\$ 12,250.00	\$ 5,250.00		
016-060		\$ 16,000.00	\$ 5,250.00	\$ 18,100.00	\$ 10,000.00	
016-063		\$ 20,000.00	\$ 6,500.00	\$ -	\$ 75,000.00	
PHA Wide Physical Improvements		\$ 2,255,554.00	\$ 2,255,554.00	\$ 2,255,554.00	\$ 2,255,554.00	
PHA Wide Management Improvements		\$ 2,530,252.00	\$ 2,530,252.00	\$ 2,530,252.00	\$ 2,530,252.00	
CFP Funds Listed for 5- year planning		\$ 7,449,406.00	\$ 7,220,300.00	\$ 7,616,032.00	\$ 7,616,829.00	
Total Replacement Housing Factor Funds						

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u> 2 </u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u> 3 </u> FFY Grant 2009 PHA FY: 2009		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	CA 16-013/Scattered Sites	Site concrete/asphalt replacement	\$ 116,000.00	CA 16-013/Scattered Sites	Replace roofs	\$ 10,000.00
		Replace fencing	\$ 58,000.00		Replace gutters	\$ 2,700.00
		Repair exterior surface/paint	\$ 34,800.00		Paint Exterior	\$ 204,570.00
CA 16-014/Belden Village	Site concrete/asphalt replacement	\$ 81,500.00	Replace wood fence		\$ 63,530.00	
	Replace fencing	\$ 163,000.00	Landscape upgrades		\$ 19,560.00	
	Upgrade plumbing	\$ 81,500.00	Replace concrete parking lot		\$ 21,130.00	
CA 16-015/Chamoune Apts.	Repair exterior surface/paint	\$ 10,200.00	Replace site concrete flatwork		\$ 13,050.00	
	Site concrete/asphalt replacement	\$ 34,000.00	Replace vertical blinds		\$ 11,820.00	
	Replace fencing	\$ 17,000.00				
CA 16-016/Genesee Apts.	Replace fencing	\$ 11,000.00	Replace hot water heaters		\$ 8,530.00	
	Site concrete/asphalt replacement	\$ 22,000.00	Replace stucco finish		\$ 2,500.00	
CA 16-017/4390 Maple Apts.	Replace fencing	\$ 6,000.00	Replace deck coating		\$ 1,000.00	
	Site concrete/asphalt replacement	\$ 12,000.00	Replace carpeting		\$ 150,415.00	
CA 16-018/Meade & First	Site concrete/asphalt replacement	\$ 52,000.00	CA 16-014 Belden Village		Paint exterior doors	\$ 6,566.00
	Repair exterior surface/paint	\$ 31,200.00			Paint interiors	\$ 216,008.00
				Replace toilets	\$ 43,215.00	
	Total CFP Estimated Cost		\$ 730,200.00	CA 16-015/35th St	Landscape upgrades	\$ 8,700.00

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Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u>2</u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u>3</u> FFY Grant 2009 PHA FY: 2009		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	CA 16-019/4180-2 Poplar Apts.	Site concrete/asphalt replacement	\$ 18,000.00	CA16-016 Genesee Apts.	Paint exteriors	\$ 15,448.00
		Repair exterior surface/paint	\$ 5,400.00	CA 16-017/4390 Maple Apts.	Replace hot water heaters	\$ 2,600.00
	CA 16-020/2734-44th Street	Site concrete/asphalt replacement	\$ 28,000.00	CA 16-018/Meade & First	Paint exterior trim	\$ 5,800.00
	CA 16-021/44th & Hawthorne Apts.	Site concrete/asphalt replacement	\$ 32,000.00		Replace hot water heaters	\$ 7,200.00
	CA 16-022/1399 Hollister Apts.	Repair exterior surface/paint	\$ 12,000.00		Upgrade kitchens/Bath	\$ 270,000.00
		Replace fencing	\$ 20,000.00			
	CA 16-023/4273-83 Juniper St.	Replace fencing	\$ 48,000.00	CA 16-019/ 4180/4182 Poplar	Replace concrete parking lot	\$ 24,050.00
	CA 16-024/Sycamore Road East	Site concrete/asphalt replacement	\$ 48,000.00	Total CFP Estimated Cost		\$ 1,108,392.00
		Replace fencing	\$ 24,000.00		Paint exterior	\$ 9,200.00
	CA 16-025/Sycamore Rd. West	Site concrete/asphalt replacement	\$ 44,000.00	CA 16-020/2734 44th St. & Rex Ave.	Replace vertical blinds	\$ 2,000.00
		Repair exterior surface/paint	\$ 13,200.00		Landscape upgrades	\$ 2,400.00
	CA 16-026/Cardinal, Naples & Rachel	Site concrete/asphalt replacement	\$ 22,000.00			Paint exterior
		Repair surface/color coat stucco	\$ 22,000.00	CA 16-021/ 3081/83 Hawthorne St.	Landscape upgrades	\$ 4,500.00
					Kitchen/Bath Upgrades	\$ 54,000.00
					Install subfloor and tiles	\$ 16,000.00
				CA 16-022/1399 Hollister Apts.	Replace cedar fencing	\$ 13,000.00
					Replace hot water heaters	\$ 6,800.00
					Exterior painting	\$ 35,160.00
			CA 16-023/4273-83 Juniper St.	Replace hot water heaters	\$ 10,200.00	
	Total CFP Estimated Cost		\$ 336,600.00			

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u> 2 </u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u> 3 </u> FFY Grant 2009 PHA FY: 2009			
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost	
See Annual Statement	CA 16-027/Grove Avenue Apts.	Repair exterior surface/paint	\$ 5,400.00	CA 16-024/Sycamore Rd. East	Seal and stripe asphalt	\$ 7,750.00	
		Replace fencing	\$ 9,000.00		CA 16-025/401-419 Sycamore Rd	Replace vertical blinds	\$ 9,234.00
	CA 16-028/Vista Apts.	Site concrete/asphalt replacement	\$ 66,000.00	CA 16-026/3280 A Street		Replace utility cabinet doors	\$ 540.00
		Repair exterior surface/paint	\$ 39,600.00		CA 16-027/2381 Grove Ave	Replace driveway concrete	\$ 8,500.00
	CA 16-030/Santa Margarita Apts.			CA 16-028/Vista Apts.		Kitchen/Bath Upgrades	\$ 112,500.00
		Site concrete/asphalt replacement	\$ 64,000.00		CA 16-030/ 5359/89 Santa Margarita	Paint exterior	\$ 9,300.00
	CA 16-031/Sycamore Rd. West	Site concrete/asphalt replacement	\$ 38,000.00	CA 16-028/Vista Apts.			
	CA 16-032/Juniper & Sumac Apts.	Site concrete/asphalt replacement	\$ 40,000.00		CA 16-031/401-419 Sycamore Rd	Paint exterior	\$ 38,500.00
		Repair surface/color coat stucco	\$ 40,000.00	CA 16-032/Juniper		Replace vertical blinds	\$ 13,100.00
	CA 16-033/Sycamore Rd. North	Site concrete/asphalt replacement	\$ 48,000.00		CA 16-033/Sycamore Rd.	Kitchen/Bath Upgrades	\$ 432,000.00
		Upgrade playground	\$ 50,000.00	CA 16-033/Sycamore Rd.		Replace vertical blinds	\$ 7,866.00
	CA 16-035/Belden Village	Site concrete/asphalt replacement	\$ 40,000.00		Total CFP Estimated Cost	Replace utility cabinet doors	\$ 460.00
		Replace fencing	\$ 80,000.00	\$ 801,650.00		Exterior painting	\$ 7,800.00
		Upgrade plumbing	\$ 40,000.00			Replace hot water heaters	\$ 8,500.00
					Replace concrete patios	\$ 26,000.00	
					Replace wood fence	\$ 49,400.00	
		Total CFP Estimated Cost		\$ 560,000.00			

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u> 2 </u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u> 3 </u> FFY Grant 2009 PHA FY: 2009		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	CA 16-037/4131 Maryland St.	Site concrete/asphalt replacement	\$ 48,000.00	North	Replace vertical blinds	\$ 5,400.00
	CA 16-038/78 Calle Primera	Site concrete/asphalt replacement	\$ 140,000.00	CA 16-035/Belden Village	Replace carpeting	\$ 74,085.00
	CA 16-039/Cargil Apts.	Site concrete/asphalt replacement	\$ 100,000.00		Stain and seal cabinetry	\$ 56,364.00
	CA 16-040/Grove Apts.	Repair exterior surface/paint	\$ 19,200.00		Paint exterior doors	\$ 3,234.00
		Replace fencing	\$ 32,000.00		Paint interiors	\$ 106,392.00
	CA 16-043/Boston & Grand	Site concrete/asphalt replacement	\$ 22,000.00		Replace refrigerators	\$ 21,285.00
	CA 16-044/Saranac, Golfrest & Fulton	Site concrete/asphalt replacement	\$ 94,000.00	CA 16-037/4131 Maryland St	Paint exterior	\$ 6,000.00
	CA 16-046/3051 54th St.	Site concrete/asphalt replacement	\$ 14,000.00		Replace vertical blinds	\$ 3,250.00
	CA 16-047/12643-12687 El Camino	Site concrete/asphalt replacement	\$ 90,000.00	CA 16-038/ 178/179 Calle Primera	Replace mailboxes	\$ 4,500.00
	CA 16-048/2883 Boston	Site concrete/asphalt replacement	\$ 10,000.00		Replace vertical blinds	\$ 15,600.00
	CA 16-049/33rd, 38th, 45th, Cherokee	Site concrete/asphalt replacement	\$ 86,000.00	CA 16-040 Grove Apts.	Replace concrete paving	\$ 25,500.00
	CA 16-050/30th, 45th, Bancroft & Cherokee		\$ 84,000.00	CA 16-043/Grand	Paint exterior	\$ 8,640.00
	CA 16-055/32nd, Arizona, Eastman & Levant	Replace fencing	\$ 64,000.00	CA 16-044/7281 Saranac	Landscape upgrades	\$ 7,000.00
	CA 16-057/4479 Altadena	Site concrete/asphalt replacement	\$ 16,000.00		Paint exterior	\$ 13,000.00
	Total CFP Estimated Cost		\$ 819,200.00		Replace vertical blinds	\$ 2,900.00

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u>2</u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u>3</u> FFY Grant 2009 PHA FY: 2009			
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost	
See Annual Statement	CA 16-058/Alabama & Market	Site concrete/asphalt replacement	\$ 56,000.00	CA 16-044/7526 Fulton St	Replace vertical blinds	\$ 11,100.00	
	CA 16-059/Mira Mesa & Averil	Site concrete/asphalt replacement	\$ 48,000.00	CA 16-044/7891 Golfcrest	Replace vertical blinds	\$ 3,800.00	
		Security	\$ 36,000.00	CA 16-046/3051 54th St.	Paint exterior	\$ 5,900.00	
	CA 16-060/4751 33rd	Site concrete/asphalt replacement	\$ 16,000.00	CA 16-047/ 12643/67 El Camino Real	Pavement seal	\$ 16,200.00	
	CA 16-063/30th, 36th	Site concrete/asphalt replacement	\$ 20,000.00		Exterior painting	\$ 77,250.00	
	PHA Wide Physical Improvements		Maintenance tools/vehicles	\$ 123,000.00	CA 16-048/2883 Boston	Replace vertical blinds	\$ 11,600.00
			In-house inspections	\$ 256,804.00		Replace vertical blinds	\$ 1,950.00
			Sliding screen doors	\$ 125,000.00	Total CFP Estimated Cost	\$ 572,650.00	
			Refrigerators	\$ 560,400.00	CA 16-049/33rd, 38th, 45th, 51st	Replace wood fence	\$ 7,700.00
			Sliding screen door threshold	\$ 250,000.00		Paint and seal cabinets	\$ 5,600.00
			Drapery/blinds	\$ 200,000.00		Paint exteriors	\$ 10,110.00
			Stoves	\$ 490,350.00		Replace vertical blinds	\$ 1,200.00
			Improve Learning Opportunity Centers	\$ 250,000.00		CA 16-055/Ivy St. &	Replace hot water heaters
				CA 16-057/Altadena	Paint exterior	\$ 13,900.00	
				CA 16-058/Market St	Paint exterior	\$ 23,700.00	
	Total CFP Estimated Cost		\$ 2,431,554.00		Paint exterior wood	\$ 5,000.00	

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u> 2 </u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u> 3 </u> FFY Grant 2009 PHA FY: 2009		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	PHA Wide Management Improvements	Computer Instruction	\$ 200,000.00	CA 16-059/Mira Mesa & Averil	Replace vertical blinds	\$ 1,125.00
		Resident Development	\$ 247,604.00		Paint exterior wood	\$ 5,000.00
		Sr. Resident Initiatives Coordinator	\$ 481,504.00		Replace vertical blinds	\$ 1,125.00
		Supv. Sr. Resident Initiatives Coordinators	\$ 527,200.00	CA 16-060/4751 33rd	Paint exterior	\$ 5,250.00
		Transportation	\$ 20,000.00	CA 16-063/36th St.	Replace wood fence	\$ 6,500.00
		Youth Diversionary Programs	\$ 253,944.00	PHA Wide Physical Improvements	Maintenance tools/vehicles	\$ 123,000.00
		Computer Upgrades	\$ 800,000.00		In-house inspections	\$ 256,804.00
			Sliding screen doors		\$ 125,000.00	
			Refrigerators		\$ 560,400.00	
			Sliding screen door threshold		\$ 250,000.00	
			Drapery/blinds		\$ 200,000.00	
			Stoves		\$ 490,350.00	
			Improve Learning Opportunity Centers	\$ 250,000.00		
			Total CFP Estimated Cost		\$ 3,043,514.00	
					Computer Instruction	\$ 200,000.00
					Resident Development	\$ 247,604.00
					Sr. Resident Initiatives Coordinator	\$ 481,504.00
				Supv. Sr. Resident Initiatives Coordinators	\$ 527,200.00	
	Total CFP Estimated Cost		\$ 2,530,252.00	PHA Wide Management Improvements		

Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u> 2 </u> FFY Grant 2008 PHA FY: 2008			Activities for Year: <u> 3 </u> FFY Grant 2009 PHA FY: 2009		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement				improvements	Transportation	\$ 20,000.00
					Youth Diversionary Programs	\$ 253,944.00
					Computer Upgrades	\$ 800,000.00
				Total CFP Estimated Cost		\$ 2,530,252.00

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages - Work Activities

Activities for Year: <u>4</u>	Activities for Year: <u>4</u>			Activities for Year: <u>5</u>			
for	FFY Grant 2010			FFY Grant 2011			
Year 1	PHA FY: 2010			PHA FY: 2011			
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost	
See Annual Statement	CA 16-013/Scattered Sites	Exterior Painting	\$ 105,600.00	CA 16-013/Scattered Sites	Replace roofs	\$ 10,000.00	
		Replace cedar wood fence	\$ 54,130.00		Replace gutters	\$ 3,500.00	
		Replace Roof Shingles	\$ 5,000.00		Paint Exterior	\$ 204,570.00	
		Replace Gutters & Downspouts	\$ 1,200.00		Replace wood fence	\$ 63,530.00	
		Replace Wood Fascia & Eaves	\$ 1,100.00		Security Lighting	\$ 2,880.00	
		Provide Stucco Color Coat	\$ 2,500.00		Exterior wood repair	\$ 6,000.00	
		Replace Vertical Blinds	\$ 5,750.00		Replace site concrete flatwork	\$ 13,050.00	
		Landscape Upgrades	\$ 4,800.00		Replace vertical blinds	\$ 11,820.00	
		Irrigation Upgrades	\$ 8,400.00		Kitchen/Bath Upgrades	\$ 360,000.00	
		Replace utility cabinet doors	\$ 1,000.00		Replace hot water heaters	\$ 8,530.00	
		Repair stucco & color coat	\$ 5,500.00		Colorcoat	\$ 65,000.00	
		Replace ranges	\$ 5,500.00		Replace deck coating	\$ 1,000.00	
		Replace reffridgerators	\$ 8,250.00		Replace carpeting	\$ 150,415.00	
		Upgrade phone entry system	\$ 2,500.00		CA 16-014 Belden Village	Exterior wood repair	\$ 170,000.00
		Replace hot water heaters	\$ 3,400.00	Paint interiors		\$ 216,008.00	
		Replace security screen doors	\$ 2,100.00	Replace toilets		\$ 43,215.00	
		Provided deck coating	\$ 1,500.00	CA 16-015/34th St	Exterior wood repair	\$ 5,500.00	
		Provide balcony cement coating	\$ 1,500.00	CA16-016 Genesee Apts.	Replace cedar fencing	\$ 9,000.00	
		Replace shower doors	\$ 1,250.00	CA 16-017/4390 Maple Apts.	Replace hot water heaters	\$ 2,600.00	
		Asphalt seal & stripe	\$ 2,200.00	CA 16-018/Meade & First	Paint exterior trim	\$ 5,800.00	
		Demolish carport	\$ 3,500.00		Replace stoves	\$ 8,400.00	
		Stucco repair & color coat	\$ 37,520.00		Upgrade kitchens/Bath	\$ 270,000.00	
		CA 16-014 Belden Village	Replace vertical blinds	\$ 15,410.00	CA 16-019/ 4180/4182 Poplar	Replace concrete parking lot	\$ 24,050.00
		Total CFP Estimated Cost		\$ 279,610.00	Total CFP Estimated Cost		\$ 1,654,868.00

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages - Work Activities

Activities for Year: <u>4</u>	Activities for Year: <u>4</u>			Activities for Year: <u>5</u>		
for	FFY Grant 2010			FFY Grant 2011		
Year 1	PHA FY: 2010			PHA FY: 2011		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	CA 16-015/34 St & 35th St	Replace concrete parking surface	\$ 14,500.00	CA 16-020/2734 44th St. & Rex Ave.		
		Replace cedar wood fence	\$ 16,500.00		Exterior wood repair	\$ 8,000.00
		Replace ranges	\$ 2,900.00		Landscape upgrades	\$ 2,400.00
		Replace hot water heaters	\$ 5,200.00			
		Replace utility cabinet doors	\$ 500.00	CA 16-021/ 3081/83 Hawthorne St.	Exterior wood repair	\$ 5,500.00
		Replace reffridgerators	\$ 2,500.00		Kitchen/Bath Upgrades	\$ 60,000.00
		Exterior Painting	\$ 3,600.00		Install subfloor and tiles	\$ 16,000.00
	CA16-016 Genesee Apts.	Replace cedar wood fence	\$ 28,000.00	CA 16-022/1399 Hollister Apts.	Replace cedar fencing	\$ 15,000.00
		Replace Pedistal Mailboxes	\$ 1,500.00		Replace gutters	\$ 14,000.00
	CA 16-018/Meade & First	Replace roofing	\$ 4,500.00	CA 16-023/4273-83 Juniper St.	Replace concrete parking surface	\$ 14,500.00
		Replace gutters & downspouts	\$ 1,400.00			
		Replace Pedistal Mailboxes	\$ 3,000.00	CA 16-024/Sycamore Rd. East	Security Lighting	\$ 2,880.00
		Replace bath accessories	\$ 3,100.00	CA 16-025/401-419 Sycamore Rd	Replace vertical blinds	\$ 9,234.00
		Replace light fixtures	\$ 1,300.00		Security Lighting	\$ 2,880.00
		Replace roof tiles	\$ 4,500.00	CA 16-026/3280 A Street	Replace driveway concrete	\$ 8,500.00
		Upgrade phone entry system	\$ 5,000.00			
	CA 16-019/ 4180/4182 Poplar	Kitchen & Bathroom Upgrades	\$ 121,500.00	CA 16-027/2381 Grove Ave	Paint exterior	\$ 9,300.00
		Replace patio doors	\$ 2,200.00		Landscape & irrigation upgrades	\$ 15,000.00
		Landscape & irrigation upgrades	\$ 9,000.00	CA 16-028/Vista Apts.	Paint exterior	\$ 38,500.00
		Replace security screen doors	\$ 2,400.00		Replace stoves	\$ 25,200.00
		Replace reffridgerators	\$ 3,700.00	CA 16-031/401-419 Sycamore Rd	Replace vertical blinds	\$ 7,866.00
		Replace VCT floors & underlayment	\$ 38,000.00		Landscape & irrigation upgrades	\$ 9,000.00
		Total CFP Estimated Cost		\$ 274,800.00	Total CFP Estimated Cost	

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u>4</u> FFY Grant 2010 PHA FY: 2010			Activities for Year: <u>5</u> FFY Grant 2011 PHA FY: 2011			
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost	
	CA 16-033/Sycamore Rd. North	Landscape Upgrades	\$ 16,000.00	PHA Wide Management Improvements	Computer Instruction	\$ 200,000.00	
		Kitchen & Bath Upgrades	\$ 256,500.00		Resident Development	\$ 247,604.00	
		Replace ranges	\$ 7,500.00		Sr. Resident Initiatives Coordinator	\$ 481,504.00	
		Replace refridgerators	\$ 10,000.00		Supv. Sr. Resident Initiatives Coordinators	\$ 527,200.00	
	CA 16-035/Belden Village	Balcony deck coating	\$ 27,250.00		Transportation	\$ 20,000.00	
		Exterior paiting	\$ 292,800.00		Youth Diversionary Programs	\$ 253,944.00	
		Stucco repair & color coat	\$ 18,480.00		Computer Upgrades	\$ 800,000.00	
					Total CFP Estimated Cost		\$ 2,530,252.00
	CA 16-037/4131 Maryland St	Kitchen & Bath Upgrades	\$ 324,000.00				
	CA 16-038/ 178/179 Calle Primera	Replace entry doors	\$ 59,000.00				
		Replace countertops	\$ 32,800.00				
		Replace security screen doors	\$ 19,000.00				
	CA 16-039/Pulitzer Place	Replace parking lot concrete	\$ 4,000.00				
		Replace Vertical Blinds	\$ 17,000.00				
	CA 16-040 Grove Apts.	Irrigation Upgrades	\$ 12,800.00				
		Replace trash enclosure doors	\$ 3,200.00				
		Replace flooring and underlayment	\$ 11,300.00				
		Provide window security bars	\$ 2,600.00				
		Replace ranges	\$ 9,000.00				
Replace refridgerators		\$ 13,100.00					
Replace hot water heaters		\$ 4,500.00					
Stucco repair & color coat		\$ 23,000.00					
Exterior paiting	\$ 38,400.00						
Total CFP Estimated Cost		\$ 1,209,820.00					

**Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages - Work Activities**

Activities for Year 1	Activities for Year: <u>4</u> FFY Grant 2010 PHA FY: 2010			Activities for Year: <u>5</u> FFY Grant 2011 PHA FY: 2011		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
	CA 16-043/Grand & Boston	Replace cedar wood fence	\$ 4,400.00			
		Replace VCT floors & underlayment	\$ 21,800.00			
		Replace hot water heaters	\$ 3,000.00			
	CA 16-044/7281 Saranac	Replace hot water heaters	\$ 3,400.00			
	CA 16-044/7526 Fulton St	Replace hot water heaters	\$ 12,400.00			
	CA 16-044/7891 Golfcrest	Replace hot water heaters	\$ 3,800.00			
	CA 16-046/3051 54th St.	Replace ranges	\$ 2,000.00			
		Replace refridgerators	\$ 3,000.00			
	CA 16-047/ 12643/67 El Camino Real	Replace vertical blinds	\$ 11,600.00			
		Asphalt overlay & repairs	\$ 49,000.00			
		Replace hot water heaters	\$ 21,000.00			
		Interior painting	\$ 90,000.00			
	CA 16-048/2883 Boston	Exterior painting	\$ 12,000.00			
		Replace driveway	\$ 12,000.00			
	CA 16-049/33rd, 38th, 45th, 51st, Wilson & Cherokee	Exterior Painting	\$ 14,000.00			
		Replace hot water heaters	\$ 10,400.00			
		Replace cedar wood fence	\$ 22,400.00			
	CA 16-050/30th St, Bancroft St. & Ivy St.	Landscape Upgrades	\$ 4,800.00			
		Exterior painting	\$ 28,800.00			
		Interior painting	\$ 23,500.00			
		Replace Vertical Blinds	\$ 4,500.00			
		Replace hot water heaters	\$ 16,100.00			
	CA 16-055/Eastman & Levant, Arizona St, Hornblend	Replace roofing	\$ 16,500.00			
		Replace ranges	\$ 1,200.00			
		Replace refridgerators	\$ 1,600.00			
		Bathroom upgrades	\$ 222,750.00			
		Replace hot water heaters	\$ 2,200.00			
	CA 16-058/Market St	Exterior painting	\$ 24,000.00			
	CA 16-059/Averil Rd	Replace cedar wood fence	\$ 5,250.00			
	Total CFP Estimated Cost		\$ 647,400.00			

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages - Work Activities

Activities for Year 1	Activities for Year: <u>4</u> FFY Grant 2010 PHA FY: 2010			Activities for Year: <u>5</u> FFY Grant 2011 PHA FY: 2011		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
	CA 16-060/4751 33rd	Exterior painting	\$ 9,600.00			
		Replace utility cabinet doors	\$ 500.00			
		Landscape & irrigation upgrades	\$ 8,000.00			
	PHA Wide Physical Improvements	In-house inspections	\$ 256,804.00			
		Sliding screen doors	\$ 125,000.00			
		Refrigerators	\$ 560,400.00			
		Sliding screen door threshold	\$ 250,000.00			
		Drapery/blinds	\$ 200,000.00			
		Stoves	\$ 490,350.00			
		Improve Learning Opportunity Centers	\$ 250,000.00			
	PHA Wide Management Improvements	Computer Instruction	\$ 200,000.00			
		Resident Development	\$ 247,604.00			
		Sr. Resident Initiatives Coordinator	\$ 481,504.00			
		Supv. Sr. Resident Initiatives Coordinators	\$ 527,200.00			
		Transportation	\$ 20,000.00			
		Youth Diversionary Programs	\$ 253,944.00			
		Computer Upgrades	\$ 800,000.00			
	Total CFP Estimated Cost		\$ 4,680,906.00			

Location	Subject	Current Policy	Proposed Policy	Justification
Chapter 7 Section A Page 39	Verification Procedures	For the purpose of averaging annual income or income from assets, only one of the documents used for averaging is required to be within 60 days at the time of lease-up and not 180 days from the effective date of the annual reexamination or interim certification effective date.	For the purpose of averaging annual income or income from assets, only one of the documents used for averaging is required to be within 60 days at the time of lease-up and not <i>more than</i> 180 days from the effective date of the annual reexamination or interim certification effective date.	Clarification
Chapter 8 Page 62	Transfer Policy	Non current	<u>G. TRANSFER REQUIREMENTS</u> <i>The Resident will be required to vacate the previous unit within three (3) days. The Resident will be responsible for calculated rent for both units during the transfer. The Resident will be allowed a maximum of three (3) days to complete the transfer and vacate and turn in keys for the move-out unit. Any days beyond this maximum will be charged to the Resident at the flat rent rate for the move-out unit. This amount will be calculated and included in the Final Statement.</i>	Administrative
Chapter 11 Page 77,C1	Recertification	Families are not required to report any increases in income or assets until the annual recertification, unless there is a change in family composition, and corresponding change of income	<i>Residents are required to notify the SDHC of any and all changes in family composition and/or income within 10 days of the change.</i>	Administrative
Chapter 12 Section E, Page 85	Lease Terminations Domestic Violence	None specific to termination of victims of domestic violence, dating violence, and stalking.	<i>To address the housing needs of victims of domestic violence, dating violence, sexual assault, and stalking, the following applies to all Residents: An incident or incidents of actual or threatened domestic violence(Domestic Violence includes felony or misdemeanor crimes of violence</i>	New Federal Law effective 1/5/06

Location	Subject	Current Policy	Proposed Policy	Justification
			<p><i>committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction), dating violence, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and shall not be good cause for terminating the assistance, tenancy, or occupancy rights of the victim of such violence.</i></p> <p><i>Criminal activity directly relating to domestic violence, dating violence, or stalking engaged in by a member of a Resident's household or any guest or other person under the Resident's control shall not be cause for termination of the tenancy or occupancy rights, if the Resident or an immediate member of the Resident's family is the victim or threatened victim of that domestic violence, dating violence, or stalking.</i></p> <p><i>Any Resident who engages in criminal acts of violence to family members or others will be evicted from the unit. Victimized lawful occupants will be allowed to continue residency in the unit.</i></p>	

Location	Subject	Current Policy	Proposed Policy	Justification
Chapter 12 Page 86	Lease Terminations	None current	<p><u>F. TERMINATIONS DUE TO UNREPORTED INCOME</u></p> <p><i>SDHC shall serve a termination notice when a participant fails to comply with income reporting requirements and may be referred for prosecution by the relevant authorities</i></p>	Administrative
Chapter 14 Page 90	Family Debts To the SDHC	<p><u>B. TERMINATION BY SDHC</u></p> <p><i>In the event the resident fails to respond or comply with the notice of delinquency or with any of the resident's obligations under the lease, the SDHC shall serve the resident with a 30-Day Notice of to Terminate.</i></p> <p><i>1. The decision to terminate the resident's lease shall be made by the Housing Supervisor, or designee.</i></p> <p><i>2. The SDHC shall serve the resident with a written Notice of Termination in accordance with this policy.</i></p> <p><i>3. The SDHC shall schedule an Informal Conference at the request of the resident. At this conference the resident may respond to the SDHC reasons for termination. The resident may be represented or accompanied by a person of the resident's choice.</i></p>	Deleted	Clarification covered under Chapter 13

Location	Subject	Current Policy	Proposed Policy	Justification
		<p><i>4. The SDHC shall make its decision on termination of the lease based on the evidence presented at the Informal Conference whether to:</i></p> <p><i>a. rescind or extend the Notice of Termination, or</i></p> <p><i>b. reaffirms its decision to terminate the lease</i></p> <p><i>5. The SDHC shall notify the resident in writing of its final decision and advise resident of appropriate rights under the Grievance Procedure within a reasonable time after the Informal Conference (See Chapter 13 Complaints, Grievances and Appeals).</i></p>		
<p>Chapter 14 Section H, Page 92</p>	<p>Family Debts to SDHC</p>	<p>None pertaining to EIV</p>	<p><u>H. EIV PAY PLAN AGREEMENT CONDITIONS</u></p> <p><i>1. SDHC will follow the HUD prescribed methods for verifying and validating income discrepancies prior to executing a payback or terminating eligibility. Paybacks will be executed for the following cases:</i></p> <p><i>A. Income Not Reported at Recertification >\$2,400 and <\$15,000 (HUD expects PHAs to resolve <u>unreported</u> income discrepancies of \$2,400 or greater)</i></p> <p><i>B. Income <u>Reported</u> at Recertification Exceeding \$5,000.</i></p>	<p>Administrative</p>

Location	Subject	Current Policy	Proposed Policy	Justification
			<p>2. The payback will be calculated at 30% of the gross amount of unreported income.</p> <p><i>This is a streamlining measure that will save time preparing retroactive rent calculations that include deductions and allowances.</i></p> <p>3. Participants who fail to report income at recert and the amount of unreported income exceeds \$15,000 (\$15,001 +), will be terminated from the program and may be referred for prosecution by the relevant authorities.</p>	
<p><i>Chapter 14 section I, 1 c. Page 92</i></p>	<p>Family Debts to the SDHC Interagency Intercept Collections</p>	<p><i>None regarding the Interagency Intercept Collections</i></p>	<p><u>I. INTERAGENCY INTERCEPT COLLECTIONS</u></p> <p><i>The State Franchise Tax Board (FTB) Interagency Intercept Collections Program may be used to collect delinquent monies owed by previous participants in public housing programs. Once intercepted, the tax refunds and any lottery prizes are redirected to the SDHC to whom the debts are owed. All collection efforts will follow FTB procedures. Collection efforts by the SDHC will follow FTB procedures.</i></p> <p><i>All information obtained from the FTB must be properly safeguarded (in accordance with IRS Pub 1075) since federal tax information may be involved.</i></p>	<p>Administrative</p>

Location	Subject	Current Policy	Proposed Policy	Justification
<p>Glossary</p> <p>Terms Used in Determining Rent</p> <p>Chapter 18</p> <p>Page 106</p>	<p>Enterprise Income Verification (EIV) System</p>	<p>none</p>	<p><u>Enterprise Income Verification (EIV) System</u></p> <p><i>The purpose of HUD's EIV System is to make integrated income data available from one source, via the Internet, for PHAs to use to improve income verification during required income reexaminations. EIV provides the following information:</i></p> <p><i>Monthly employer new hires</i></p> <p><i>Quarterly wages (including employer information), Federal wages are available</i></p> <p><i>Quarterly unemployment compensation</i></p> <p><i>Monthly social security (SS) and supplement security income (SSI) benefits</i></p>	<p>Clarification</p>
<p>Glossary of Housing Terms</p> <p>Page 109</p>	<p>Domestic Violence</p>	<p>none</p>	<p><i>Domestic Violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.</i></p>	<p>Clarification</p>

San Diego Housing Commission
Summary of Revisions to the Public Housing Admissions and Continued Occupancy Plan Policy

LEASE AGREEMENT

Location	Subject	Current Language	Proposed Language	Justification
Addendum I	Lease Termination Domestic Violence	Non specific to termination of victims of domestic violence, dating violence, and stalking.	<i>Addendum I attached</i>	New Federal Law effective 1/5/06
Page 5 #18 C	Obligations of the Resident	To notify the SDHC of any change in family composition, and corresponding change of income, within ten (10) working days	<i>To notify the SDHC of any and all changes in family composition and/or income within 10 days of the change.</i>	Administrative
Addendum A Page 2	House Rules	Add to current Language	<i>Residents may not bring shopping carts onto the property</i>	Administrative
Addendum D Number 1	Parking Rules	1. All vehicles must display SDHC Parking Sticker. ⁱ	All vehicles must display SDHC Parking Sticker. Parking Sticker will be issued only when: a. vehicle registration must be current and registered to the resident b. resident must provide a valid driver's license	Clarification
Addendum D Number 10	Parking Rules	10. Registration must be current and Resident must be the registered owner.	Delete	Clarification

PET POLICY

Location	Subject	Current Language	Proposed Language	Justification
Section VI A paragraph 5 Page 6	Pet Policy	5. Dogs may only be kept in dwelling units with an enclosed yard space. Pet owners may not alter their unit or patio to accommodate an animal.	<i>Delete this paragraph</i>	HUD Requirement

Summary of Revisions to the Project Based Voucher Program

Current	Revision	Explanation
<p>Program Description:</p> <p>This is a Federal Section 8 housing subsidy program that ties rental assistance directly to a specific unit or project for an aggregate term up to 15 years. The San Diego Housing Commission will fund the Project-Based Voucher Program through its Housing Choice Voucher Program (Section 8), using funds provided by the U.S. Department of Housing and Urban Development (HUD). A maximum of 100 PBV units will be provided during FY2007. The total cumulative number of PBV units will not exceed 20 percent of the baseline number of units in the PHA's voucher program.</p> <p>The Project-based Voucher Program consists of existing housing, new construction, or rehabilitation projects comprised of multifamily or single-family units. The Program is targeted to homeless persons or families that receive supportive services in addition to housing. These populations may include, but are not limited to:</p> <ul style="list-style-type: none"> • Victims of Domestic Violence • Persons with Disabilities – Mentally Ill, Developmentally Disabled, Physically Disabled • Persons with HIV/AIDS • Youth • Persons with Alcohol/Drug Addictions • Veterans <p>The program may also be used for projects serving the elderly or persons with disabilities, whether they are homeless or not.</p> <p>Projects are eligible to receive vouchers for up to 75 percent of the units, at the sole discretion of the Housing Commission.</p> <p>The PBV program provides housing assistance to qualified, very-low income individuals and families. Project-Based Voucher participants do not locate their own unit but must move to a unit already in the Project-based Voucher Program.</p>	<p>Program Description:</p> <p>This is a Federal Section 8 housing subsidy program that ties rental assistance directly to a specific unit or project for an aggregate term up to 15 years. The San Diego Housing Commission will fund the Project-Based Voucher Program through its Housing Choice Voucher Program (Section 8), using funds provided by the U.S. Department of Housing and Urban Development (HUD). A <i>minimum of 50 PBV</i> units will be provided during FY2008. The total cumulative number of PBV units will not exceed 20 percent of the baseline number of units in the PHA's voucher program.</p> <p>The Project-based Voucher Program consists of existing housing, new construction, or rehabilitation projects comprised of multifamily or single-family units. The Program is targeted to homeless persons or families that receive supportive services in addition to housing. These populations may include, but are not limited to:</p> <ul style="list-style-type: none"> • Victims of Domestic Violence • Persons with Disabilities – Mentally Ill, Developmentally Disabled, Physically Disabled • Persons with HIV/AIDS • Youth • Persons with Alcohol/Drug Addictions • Veterans <p>The program may also be used for projects serving the elderly or persons with disabilities, whether they are homeless or not.</p> <p>Projects are eligible to receive vouchers for up to 75 percent of the units, at the sole discretion of the Housing Commission.</p> <p>The PBV program provides housing assistance to qualified, very-low income individuals and families. Project-Based Voucher participants do not locate their own unit but must move to a unit already in the Project-based Voucher Program.</p>	<p>This change is to provide additional vouchers in FY2008.</p>
<p>Homeless</p>	<p>Homeless</p>	<p>This change is to further clarify</p>

Summary of Revisions to the Project Based Voucher Program

Current	Revision	Explanation
<p>An applicant is considered homeless if the applicant lacks a fixed, regular and adequate night-time residence and can provide verification that their nighttime residence is:</p> <ol style="list-style-type: none"> 1. A supervised publicly or privately operated shelter designed to provide temporary living accommodations; or 2. A public or private place that provides temporary residence for individuals intended to be institutionalized (not incarcerated); or 3. A public or private place not designed for, or ordinarily used as, regular sleeping accommodations for human beings. <p>Homeless applicants who meet the criteria described above must provide proof of homelessness. Examples of such proof include certification of homeless status from a public or private facility, including Transitional Housing, that provides shelter for such households; a copy of an arrest record for vagrancy or illegal lodging from the local police department; or other documentation that can be obtained from any social service agency that provides services to the homeless.</p>	<p>An applicant is considered homeless if the applicant lacks a fixed, regular and adequate night-time residence and can provide verification that their nighttime residence is:</p> <ol style="list-style-type: none"> 4. A supervised publicly or privately operated shelter designed to provide temporary living accommodations; or 5. A public or private place that provides temporary residence for individuals intended to be institutionalized (not incarcerated); or 6. A public or private place not designed for, or ordinarily used as, regular sleeping accommodations for human beings. <p>Homeless applicants who meet the criteria described above must provide proof of homelessness. Examples of such proof include certification of homeless status from a public or private facility, including Transitional Housing, that provides shelter for such households; a copy of an arrest record for vagrancy or illegal lodging from the local police department; or other documentation that can be obtained from any social service agency that provides services to the homeless.</p> <p>Program Goals:</p> <ul style="list-style-type: none"> • Expand <i>and stabilize</i> the housing and economic opportunities of homeless persons/families <i>and increase their economic opportunities by providing supportive services and teaching independent living skills.</i> 	<p>the goals of the program.</p>
<p>Owner Proposal Selection:</p> <p>The Housing Commission will select owner proposals through a competitive Request for Proposal process. Specifically, the PHA will advertise in a newspaper of general circulation that the PHA will accept applications for PBV assistance. The advertisement will be published once a week for three consecutive weeks with an application deadline of at least 30 days after the date the advertisement is last published. The advertisement will specify the number of PBV units that will be available.</p>	<p>Owner Proposal Selection:</p> <p>The Housing Commission will select owner proposals through a competitive Request for Proposal process. Specifically, the PHA will advertise in a newspaper of general circulation that the PHA will accept applications for PBV assistance. The advertisement will be published once a week for three consecutive weeks with an application deadline of at least 30 days after the date the advertisement is last published. The advertisement will specify the number of PBV units that will be available.</p>	<p>This change adds clarifying language.</p>

Summary of Revisions to the Project Based Voucher Program

Current	Revision	Explanation
<p>In addition, the Housing Commission will accept applications from owners with housing that is assisted under a federal, state, or local government housing assistance, community development, or supportive services program that required competitive selection of proposals (e.g. HOME and LIHTC projects). These applications will be continually accepted and evaluated based on the availability of vouchers.</p> <p>All applications will be reviewed and evaluated based on the following criteria:</p> <ol style="list-style-type: none"> 1. The project complies with the PBV site selection standards of § 983.57 and contributes to the geographic distribution of affordable housing throughout the City of San Diego, thus promoting deconcentration of poverty, and expanding housing and economic opportunities. 2. The project meets the following site and neighborhood standards: <ul style="list-style-type: none"> • Site is adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities and streets are available to service the site; • Site promotes greater choice of housing opportunities and avoids undue concentration of assisted persons in areas containing a high proportion of low-income persons; • Site is accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents; • Site is located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers is not excessive. 3. Site is suitable for facilitating and furthering full compliance with fair housing objectives. 	<p>In addition, the Housing Commission will accept applications from owners with housing that is assisted under a federal, state, or local government housing assistance, community development, or supportive services program that required competitive selection of proposals (e.g. HOME and LIHTC projects). These applications will be continually accepted and evaluated based on the availability of vouchers.</p> <p>All applications will be reviewed and evaluated based on the following criteria:</p> <ol style="list-style-type: none"> 7. The project complies with the PBV site selection standards of § 983.57 and contributes to the geographic distribution of affordable housing throughout the City of San Diego, thus promoting deconcentration of poverty, and expanding housing and economic opportunities. 8. The project meets the following site and neighborhood standards: <ul style="list-style-type: none"> • Site is adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities and streets are available to service the site; • Site promotes greater choice of housing opportunities and avoids undue concentration of assisted persons in areas containing a high proportion of low-income persons; • Site is accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents; • Site is located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers is not excessive. 9. Site is suitable for facilitating and furthering full compliance with fair housing objectives. 	

Summary of Revisions to the Project Based Voucher Program

Current	Revision	Explanation
<p>4. Proposed units fully meet federal Housing Quality Standards (HQS).</p> <p>5. Experience of the applicant in managing residential housing and providing supportive services.</p> <p>6. The project provides one or more of the following supportive services aimed at assisting homeless participants re-establish permanent independent living and those services are appropriate for the target population:</p> <ul style="list-style-type: none"> • Child care • Job training/placement • Case management • Health care, mental health care, or psychiatric care • Transportation • Employment assistance • Education • Vocational opportunities • Life skills training • Counseling, including housing counseling • Substance abuse treatment • Parenting skills • Budgeting • Housing information referrals <p>Each tenant will have an Individual Service Plan (ISP) that details the specific services to be provided, their frequency and duration. These ISPs will vary from individual to individual based on individual need.</p> <p>7. Target Population. In the event the number of PBV applications exceeds the number of available vouchers, projects will be prioritized as follows:</p> <ol style="list-style-type: none"> 1) Existing housing projects will be favored over new construction or rehabilitation projects. 2) Project provides supportive services. 	<p>10. Proposed units fully meet federal Housing Quality Standards (HQS).</p> <p>11. Experience of the applicant in managing residential housing and providing supportive services.</p> <p>12. The project provides one or more of the following supportive services aimed at assisting homeless participants re-establish permanent independent living and those services are appropriate for the target population:</p> <ul style="list-style-type: none"> • Child care • Job training/placement • Case management • Health care, mental health care, or psychiatric care • Transportation • Employment assistance • Education • Vocational opportunities • Life skills training • Counseling, including housing counseling • Substance abuse treatment • Parenting skills • Budgeting • Housing information referrals <p>Each tenant will have an Individual Service Plan (ISP) that details the specific services to be provided, their frequency and duration. These ISPs will vary from individual to individual based on individual need.</p> <p>8. Target Population. In the event the number of PBV applications exceeds the number of available vouchers, projects will be prioritized as follows:</p> <ol style="list-style-type: none"> 9) Existing housing projects will be favored over new construction or rehabilitation projects. 10) Project provides <i>comprehensive</i> supportive services. 	

Summary of Revisions to the Project Based Voucher Program

Current	Revision	Explanation
<p>3) Project serves homeless families with children (2+ bedroom units). 4) Project serves homeless persons with disabilities. 5) Project serves homeless elderly persons. 6) Project serves homeless individuals. 7) Project serves non-homeless persons with disabilities. 8) Project serves non-homeless elderly persons.</p> <p>Applications need a minimum score of 75 points (out of 100) to receive an allocation of Project-based Vouchers.</p>	<p>11) Project serves homeless families with children (2+ bedroom units). 12) Project serves homeless persons with disabilities. 13) Project serves homeless elderly persons. 14) Project serves homeless individuals. 15) Project serves non-homeless persons with disabilities. 16) Project serves non-homeless elderly persons.</p> <p>Applications need a minimum score of 75 points (out of 100) to receive an allocation of Project-based Vouchers.</p>	
<p><u>Waiting List and Lease Up</u></p> <p>The owner must notify the Housing Commission of any vacancies. When the owner notifies the Housing Commission of a vacant unit, the computer will select an adequate number of applicants within the preference category from the PBV site-specific waiting list. Selected applicants will be notified of the opportunity to be considered for the vacant unit and that it will be their responsibility to request a further opportunity if they wish to be considered for future vacancies. PBV projects may target specific homeless subpopulations such as veterans, victims of domestic violence, persons with HIV/AIDS. The Housing Commission will screen waiting list applicants using site-specific criteria.</p> <p>If the owner is unable to find a suitable tenant from the initial referral list, the owner must return the referral list with their comments regarding each applicant within ten days of expiration date. The owner must then request another referral list, continuing this process until a suitable tenant from the Waiting List is found. Owners are encouraged to refer clients to the Housing Commission Waiting List. The Housing Commission (or designee) will conduct an interview to determine eligibility for the PBV program. For PBV site-specific projects, the owners are responsible for determining tenant eligibility to receive site-specific supportive services.</p> <p>Tenants (previously homeless) receiving supportive services must comply with their ISP as a condition of tenancy. The tenant and the PHA must sign a statement of family responsibility that contains all of the family obligations including the family's participation in an</p>	<p><u>Waiting List and Lease Up</u></p> <p>The owner must notify the Housing Commission of any vacancies. When the owner notifies the Housing Commission of a vacant unit, the computer will randomly select the next 20 applicants an adequate number of applicants within the preference category from the Housing Commission's PBV site-specific waiting list. Selected applicants will be notified of the opportunity to be considered for the vacant unit and that it will be their responsibility to request a further opportunity if they wish to be considered for future vacancies. Applicants will be provided a description of the type of supportive services offered at the PBV project. PBV projects may serve target specific homeless subpopulations such as veterans, victims of domestic violence, and persons with disabilities. HIV/AIDS. The Housing Commission will screen waiting list applicants using site-specific criteria.</p> <p>If the owner is unable to find a suitable tenant from the initial referral list, the Housing Commission will select the next 20 applicants within the preference category from the PBV waiting list. If the owner is still unable to find a suitable tenant from the initial referral list, the owner may select a tenant from their own waiting list who is also on the Housing Commission's PBV Waiting List must return the referral list with their comments regarding each applicant within ten days of expiration date. The owner must then request another referral list, continuing this process until a suitable tenant from the Waiting List is found. Owners are encouraged to refer clients to the Housing Commission Waiting List. The Housing Commission (or designee) will conduct</p>	<p>The waiting list is changed from a site-specific waiting list to a separate waiting list for the PBV program. This list will serve several PBV projects.</p> <p>In addition, the waiting list referral process has been changed to limit the number of referral lists sent to PBV owners. This will lease the PBV units up sooner and avoid lengthy vacancies.</p>

Summary of Revisions to the Project Based Voucher Program

Current	Revision	Explanation
<p>owner-provided supportive services program. Failure by the family without good cause to fulfill its ISP obligation will result in termination of PBV assistance.</p>	<p>an interview to determine eligibility for the PBV program. For PBV site-specific projects, the owner's are responsible for determining tenant eligibility to receive site-specific supportive services.</p> <p>Tenants must comply with owner's supportive services program requirements as a condition of tenancy. The tenant and the PHA must sign a statement of family responsibility that contains all of the family obligations including the family's participation in an owner-provided supportive services program. Failure by the family without good cause to fulfill its supportive services obligation will result in termination of PBV assistance.</p>	
<p>PBV Waiting List Preferences</p> <p>The Housing Commission will use the following local preference system for the PBV waiting list:</p> <ol style="list-style-type: none"> 1. Within each of the following categories, applicants will be served by the date and time of application based on the availability of site-specific supportive services: <ul style="list-style-type: none"> • Homeless Families • Victims of Domestic Violence • Homeless persons with disabilities • Homeless veterans • Homeless elderly persons • Homeless individuals • Persons with HIV/AIDS (homeless or non-homeless) • Non-homeless persons with disabilities • Non-homeless elderly persons 	<p>PBV Waiting List Preferences</p> <p>The Housing Commission <i>PBV Waiting List</i> will <i>give a</i> use the following local preference to <i>homeless persons/ families, the elderly, and persons with disabilities</i> system for the PBV waiting list: <i>Homeless persons will receive a preference over non-homeless.</i></p> <p><i>Applicants will be referred from the Housing Commission PBV Waiting List based on the date of time of their application.</i></p> <ol style="list-style-type: none"> 2. Within each of the following categories, applicants will be served by the date and time of application based on the availability of site-specific supportive services: <ul style="list-style-type: none"> • Homeless Families • Victims of Domestic Violence • Homeless persons with disabilities • Homeless veterans • Homeless elderly persons • Homeless individuals • Persons with HIV/AIDS (homeless or non-homeless) • Non-homeless persons with disabilities • Non-homeless elderly persons 	<p>Language revised to clarify that the PBV Waiting List Preference is for the homeless, elderly or persons with disabilities.</p>

San Diego Housing Commission
Summary of Revisions to the Family Self-Sufficiency Action Plan

Current	Revision	Explanation
<p><u>MINIMUM PROGRAM SIZE</u> The current FSS Action Plan identifies total program size as 550.</p>	<p><u>MINIMUM PROGRAM SIZE</u> Revised program size is 500.</p>	<p>The total program size was decreased to establish an 83 to 1 coordinator to participant ratio.</p>
<p><u>FINANCIAL ASSISTANCE</u> The current FSS Action Plan allows for participants who are <u>not</u> expected to meet graduation requirements within their contract term to receive financial support services, such as gas cards and book scholarships.</p>	<p><u>FINANCIAL ASSISTANCE</u> The revision restricts access to financial support to only those participants who are actively progressing toward completion of graduation requirements. Participants who are not expected to graduate from the program may continue to receive service coordination and other support services, such as career planning and information referral.</p>	<p>This change will allow limited financial resources to be allocated more efficiently, by giving priority for financial support to participants who are expected to graduate from FSS.</p>
<p><u>FINANCIAL ASSISTANCE</u> The current FSS Action Plan states that requests for payment of items that have been purchased previously through FSS escrow funds will not be granted.</p>	<p><u>FINANCIAL ASSISTANCE</u> The revision will expand the definition of “previously purchased items” to include duplicate expenses, such as auto repairs.</p>	<p>This will trigger the intervention of FSS Service Coordinators, who will assist participants to solve recurring barriers through other means besides depleting their escrow accounts.</p>
<p><u>DENIAL OF PARTICIPATION</u> The current FSS Action Plan states that participation may be denied to families who have successfully met the terms of a previous FSS Contract. The Action Plan does not address the issue of those families who have participated in FSS previously, but did not meet graduation requirements during their original contract term.</p>	<p><u>DENIAL OF PARTICIPATION</u> The revision will expand Denial of Participation to include those families who have participated in the FSS Program previously, but did not meet graduation requirements during their original contract term.</p>	<p>This change provides clarification of current policy.</p>
<p><u>GRADUATION REQUIREMENTS</u> The current FSS Action Plan does not explicitly provide for early graduation from the program.</p>	<p><u>GRADUATION REQUIREMENTS</u> The revision will allow participants who meet all graduation requirements prior to the expiration of their Contract to graduate early from FSS, if no additional significant steps are added to their Career Plan.</p>	<p>This change provides clarification of current policy.</p>
<p><u>GRADUATION REQUIREMENTS</u> The current FSS Action Plan does not clearly define what constitutes a valid final goal under the Career Plan.</p>	<p><u>GRADUATION REQUIREMENTS</u> The revision will define the final goal as job advancement on the part of the participant through increased skills acquired during the term of the contract.</p>	<p>This change provides clarification of current policy.</p>