

**REPORT****DATE ISSUED:** July 2, 2009**REPORT NO:** HCR 09-052**ATTENTION:** Chair and Members of the Housing Commission  
For the Agenda of July 10, 2009**REQUESTED ACTION:**

Approval of the Housing Commission's FY10 Section 8 Administrative Plan

**STAFF RECOMMENDATION:**

Approve the FY10 Section 8 Administrative plan (Attachment 1) that details the proposed changes to the Section 8 program, including the Moving to Work (MTW) initiatives previously approved by the Housing Commission Board on October 13, 2008.

**BACKGROUND:**

HUD requires all Public Housing Authorities (PHA) to adopt a written administrative plan that establishes local policies for program administration. The plan must state the PHA's policy in those areas where the PHA has discretion to establish local policy.

With the recent approval of the Housing Commission's FY10 MTW plan, the Housing Commission must add the initiatives contained in the MTW Plan to the Section 8 Administrative Plan and receive Board approval of the plan prior to implementation of any of the initiatives.

**FISCAL CONSIDERATIONS:**

None with this action

**PREVIOUS COUNCIL and/or COMMITTEE ACTION:**

On September 29, 2008, a workshop was held with the Housing Commission board members to discuss the Housing Commission's reinstatement as a MTW Agency. Included in this meeting was discussion of the various initiatives that the agency intended to implement if approved by the board.

On October 13, 2008 the Housing Commission Board authorized the President and Chief Executive Officer (CEO) to submit an application to HUD for reactivation of the Housing Commission's status as a Moving to Work agency. The subject report included a discussion of the various initiatives staff proposed and included the draft Moving to Work draft plan. The board voted 5-0 in favor of the report. On October 28, 2008, the Housing Authority also voted unanimously in favor of the application for Moving to Work reactivation.

**COMMUNITY PARTICIPATION AND PUBLIC OUTREACH EFFORTS:**

A Public Hearing was held on November 12, 2008 at the Housing Commission's central office to give the public an opportunity to view and discuss the proposed MTW plan. The public comments were exclusively positive.

**ENVIRONMENTAL REVIEW:**

This activity does not fall within the definition of "project" under the CEQA Guidelines Sections 15060(c)(3) and 15378. This activity is exempt from NEPA under §58.34(a)(2) information and financial services and §58.34(a)(3) administrative and management activities.

**KEY STAKEHOLDERS & PROJECTED IMPACTS:**


The changes highlighted on Attachment 1, particularly the MTW initiatives included in this Administrative plan will affect current and future Section 8 and Public Housing participants and owners. The intended impact of the MTW initiatives will be to streamline family and agency administrative obligations and help families gain education, training and skills to break cycles of family poverty and assist with upward mobility. As a group, elderly and disabled families will not be adversely affected by the MTW.

Respectfully submitted,



Jeff Davis  
Vice President, Rental Assistance Programs

Approved by,

  
Carrol M. Vaughan  
Executive Vice President &  
Chief Operating Officer

Attachments: Proposed Section 8 Administrative Plan Changes

Hard copies are available for review during business hours at the Housing Commission offices at 1122 Broadway, San Diego, CA 92101, Main Lobby and at the Office of the City Clerk, 202 C Street, San Diego, CA 92101. You may review complete docket materials on the San Diego Housing Commission website at [www.sdhc.org](http://www.sdhc.org).

ATTACHMENT 1

San Diego Housing Commission  
 Rental Assistance Program  
 Administrative Plan  
 Pending Approval July 10, 2009

Current	Revision	Explanation
<p><b>Chapter 1</b></p>	<p><b>Chapter 1</b>  <b>A. <u>MOVING FORWARD</u></b>            On January 14, 2009 HUD approved the San Diego Housing Commission as a Moving to Work agency. The Moving to Work demonstration allows public housing authorities (PHAs) to design and test various approaches for providing and administering housing assistance. The Department of Housing and Urban Development's (HUD) three main objectives of the program are to:</p> <ul style="list-style-type: none"> <li>✓ Reduce cost and achieve greater cost effectiveness in Federal expenditures;</li> <li>✓ Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self sufficient; and</li> <li>✓ Increase housing choices for low-income families.</li> </ul>	<p>New language added to reflect the Moving Forward policy.</p>

Current	Revision	Explanation
<p><b>K. CROSS LISTING OF PUBLIC HOUSING AND SECTION 8</b>  The Housing Commission will not merge the waiting lists for public housing and Section 8. However, if the Section 8 waiting list is open when the applicant is placed on the public housing list, the Housing Commission must offer to place the family on both lists. If the public housing waiting list is open at the time an applicant applies for Section 8, the Housing Commission must offer to place the family on the public housing waiting list.</p> <p><b>U. Live-in Aides</b>  A Family may include live-in aides provided that</p>	<p>Locally, the Moving to Work program is known as “Moving Forward”. Throughout this document there are policy references to Moving Forward. These policies only apply to vouchers that qualify to be administered under the Moving to Work program.</p> <p>The Housing Commission has a portfolio of units that are not part of the Moving Forward program. They include:</p> <ul style="list-style-type: none"> <li>• Veterans Affairs Supportive Housing;</li> <li>• Moderate Rehabilitation;</li> <li>• AB 2034 units;</li> <li>• Family Unification;</li> <li>• Housing Conversion Opt-Out</li> <li>• Preservation units;</li> <li>• Others as designated by HUD.</li> </ul> <p><b>K. CROSS LISTING OF PUBLIC HOUSING AND SECTION 8</b>  <u>The Housing Commission will not merge the waiting lists for public housing and Section 8.</u></p> <p><b>U. Definition of a Live-in Aide:</b>  A Family may include a live-in aide provided</p>	<p>Paragraph revised. Most public housing units (all but 36 units) disposed.</p> <p>New regulations for Live-in-aide criteria.</p>

Current	Revision	Explanation
<p>such live-in aides:</p> <p>Are determined by the Housing Commission to be essential to the care and well being of an elderly person, a near-elderly person, or a person with a disability;</p> <p>Are not obligated for the support of the person(s); and</p> <p>Would not be living in the unit except to provide care for the person(s).</p> <p>Live-in aides are treated differently than family members:</p> <p>Income of live-in aides will not be counted for purposes of determining eligibility or level of benefits;</p> <p>Live-in aides are not subject to Non-Citizen requirements; and</p> <p>Live-in aides may not be considered as a remaining member of the participant family.</p> <p>Relatives are not automatically excluded from being live-in aides, but they must meet all of the elements in the live-in aide definition described above. Owners of the assisted unit may not be a live-in aide.</p> <p>A live-in aide may only reside in the unit with the approval of the Housing Commission. Written verification will be required from a reliable, knowledgeable professional. The verification provider must certify that a live-in aide is needed</p>	<p>that such a live-in aide:</p> <p>Is determined by the Housing Commission to be essential to the care and well being of an elderly person, a near-elderly person, or a person with a disability;</p> <p>Is not obligated for the support of the person(s); and</p> <p>Would not be living in the unit except to provide care for the person(s).</p> <p>A Live-in aide is treated differently than family members:</p> <p>Income of live-in aides will not be counted for purposes of determining eligibility or level of benefits;</p> <p>A Live-in aide is not subject to Non-Citizen Rule requirements; and a</p> <p>A Live-in aide may not be considered as a remaining member of the participant family.</p> <p>A relative is not automatically excluded from being a live-in aide, but he/she must meet all of the elements in the live-in aide definition described above. Owners of the assisted unit may not be a live-in aide.</p> <p>A live-in aide may only reside in the unit with the approval of the Housing Commission. Written verification will be required from a reliable, knowledgeable professional. The verification provider must certify that a live-in</p>	

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<p>for the care of the family member who is elderly, near elderly (50-61) or disabled.</p>	<p>aide is needed for the care of the family member who is elderly, near elderly (50-61) or disabled.</p>	
<p><i>A family member may have more than one person who shares the responsibility of providing full time live-in aide care. Each person must be approved by the Housing Commission.</i></p>		<p><i>Italicized text has been removed from regulations.</i></p>
<p>At any time, the Housing Commission will refuse to approve a particular person as a live-in aide or may withdraw such approval if:</p>	<p>At any time, the Housing Commission will refuse to approve a particular person as a live-in aide or may withdraw such approval if:</p>	
<p>The person has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;</p>	<p>The person has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;</p>	
<p>The person has a history of drug-related criminal activity or violent criminal activity as defined by this Administrative Plan; or</p>	<p>The person has a history of drug-related criminal activity or violent criminal activity as defined by this Administrative Plan; or</p>	
<p>The person currently owes rent or other amounts to the Housing Commission or to another Housing Authority in connection with Section 8 or public housing assistance under the 1937 Act.</p>	<p>The person currently owes rent or other amounts to the Housing Commission or to another Housing Authority in connection with Section 8 or public housing assistance under the 1937 Act.</p>	
	<p><b>Chapter 3</b></p>	
	<p><b><u>A. MOVING FORWARD: METHODS OF VERIFICATION</u></b></p> <p>The San Diego Housing Commission will verify information through the four methods of verification in the following order of priority:</p>	<p>New language added to reflect Moving Forward policy.</p>

Current	Revision	Explanation
	<ol style="list-style-type: none"> <li>1. Review of Documents</li> <li>2. Up-front Income Verification (UIV)</li> <li>3. Third-party Written/Oral</li> <li>4. Self Declaration</li> </ol> <ul style="list-style-type: none"> <li>• Note: EIV will continue to be generated and must be used in conjunction with review of documents.</li> </ul> <p>Verifications cannot be older than 180 days from the effective date of the certification for both applicants and participants.</p> <p><b><u>Asset Verification</u></b></p> <p>If the applicant/participant “self-declares” that the combined total net value of assets is less than \$10,000, the Housing Assistant will not verify the assets through any method. The Housing Assistant will not request verification from the client. The Housing Assistant will not enter any asset information in ECS.</p> <p>All other definitions, procedures and policies described in this Chapter shall be adhered to with the exception of those referenced in this section.</p>	

Current	Revision	Explanation
	<p><b><u>J. MOVING FORWARD: SECURITY DEPOSIT LOAN PROGRAM</u></b></p> <p><b>Summary</b></p> <p>The San Diego Housing Commission will offer a Security Deposit Loan Program to assist low income Moving Forward families moving to (or within) the Housing Commission's targeted low poverty zip codes and who do not have the funds required for a large security deposit. The tenant will apply for loan from the San Diego Housing Commission for an amount not to exceed the Security Deposit being required by the owner, or \$1450, whichever is less. The tenant and all adult family members will sign a Promissory Note with the Housing Commission for the amount of the interest-free loan, and an agreement to pay in installments.</p> <p>If tenant defaults on Promissory Note with the Housing Commission, normal PIU action will be taken.</p> <p><b>Eligibility</b></p> <ul style="list-style-type: none"> <li>• The tenant must have an HCV Rental Assistance Program voucher and meet all eligibility requirements for the HCV Rental Assistance Program</li> <li>• The tenant must be moving into (or within) the Housing Commission's</li> </ul>	<p>New language added to reflect Moving Forward policy.</p>



Current	Revision	Explanation
<p>Chapter 6</p>	<p>targeted low poverty zip codes</p> <ul style="list-style-type: none"> <li>• The tenant must fill out an application and provide a copy of the lease agreement</li> <li>• The tenant must show he/she has the means to pay the monthly payments but insufficient means to pay the entire deposit.</li> </ul> <p>Chapter 6</p> <p><b>A. <u>MOVING FORWARD: AFFORDABILITY CAP ON FAMILY SHARE AT THE TIME OF INITIAL UNIT LEASING IN LOW-POVERTY NEIGHBORHOODS</u></b></p> <p>In support of the objective to encourage more housing choice voucher assisted families to move into low-poverty areas and deconcentrate poverty within the Housing Commission's jurisdiction, the 40% rental cap will be eliminated for participating families who move into targeted low-poverty neighborhoods and a new 50 percent cap will be put in place. In order to qualify for this benefit, the family must demonstrate that it has the ability to pay the higher rent burden and may be required to enroll and participate in a budgeting workshop.</p>	<p>New language added to reflect Moving Forward policy.</p>

Current	Revision	Explanation
Chapter 8	Chapter 8	New language added to reflect Moving Forward policy.
	<p><b>F. <u>MOVING FORWARD: INTERIM CHANGES</u></b></p> <p><b><u>Rent Increases</u></b> The Housing Commission will not perform interim increases in rent between regularly scheduled recertifications, except for:</p> <ul style="list-style-type: none"> <li>▪ Family Self-Sufficiency clients who wish to have their escrow payments increased;</li> <li>▪ Families who have previously had an interim reduction in rent since their last recertification; and</li> <li>▪ “Zero income” families reporting new income.</li> </ul> <p><b><u>Rent Reductions</u></b> Interim reductions in rent will be made, but limited to provide incentives to employed families to remain employed. For households who are not elderly or disabled, interim adjustments will be limited as follows.</p> <ul style="list-style-type: none"> <li>▪ Households may only request an interim reduction once between regularly scheduled recertification periods. However, see the Hardship Policy below for exceptions to this limitation;</li> <li>▪ No reduction based upon loss of job will be processed until the Housing Commission receives documentation of eligibility or ineligibility for unemployment benefits;</li> <li>▪ Decreases in public assistance income that</li> </ul>	

Current	Revision	Explanation
<p><b>Chapter 9</b></p> <p><b>C. RENT REASONABLENESS DETERMINATIONS</b></p> <p>The Housing Commission will determine and document on a case-by-case basis that the approved rent is reasonable in comparison to rent for other comparable unassisted units in the open</p>	<p>are the result of a finding of fraud or a failure to comply with work/ school requirements will not be processed.</p> <ul style="list-style-type: none"> <li>▪ In calculating the reduction, all household income, including previously unreported income, will be counted;</li> <li>▪ The household's loss of income must be expected to last longer than 90 days;</li> <li>▪ All interim rent reductions will be temporary. After receiving a rent decrease, a family becomes obligated to report any new income within ten business days. A follow-up interim will be conducted to include new income, and the resultant increase will be implemented after providing the family with 30 days notice of the increase.</li> </ul> <p>The current Housing Choice Voucher interim policy will continue to apply to elderly and disabled households. These households may report income decreases as they occur and receive a reduction in their rent to be effective the first of the following month after reporting the change.</p> <p><b>Chapter 9</b></p> <p><b>C. RENT REASONABLENESS DETERMINATIONS</b></p> <p>The Housing Commission will determine and document on a case-by-case basis that the approved rent is reasonable in comparison to rent for other comparable unassisted units in the</p>	

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<p>market.</p> <p>When requested, the owner must give the Housing Commission information on rents charged by the owner for other units in the premises or elsewhere.</p> <p>Data for other unassisted units will be gathered from realtors, professional associations, inquiries of owners, market surveys, and other available sources.</p> <p>Some or all of the following factors will be used for evaluating rent reasonableness:            Size (number of bedrooms/square footage), location, Quality, Amenities (bathrooms, dishwasher, air conditioning, etc.), Housing Services, Age of unit (on occasion), Unit Type, Maintenance, Utilities.</p> <p>Note: The age of the unit rarely impacts the cost of rental housing in the San Diego Market.</p> <p><b>PHA RENT REASONABLENESS METHODOLOGY</b></p> <p><b><u>Rent Reasonableness Methodology</u></b></p> <p>The Housing Commission maintains an automated database by sub-regional areas of unassisted units for making rent reasonableness determinations. The Housing Commission may also use data gathered from newspapers, realtors,</p>	<p>open market. It is the SDHC's policy to approve rents based on the general open market for comparable rentals and not based on the few exceptions that may rent for more.</p> <p><u>By accepting each monthly housing assistance payment, the owner certifies that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises.</u></p> <p><u>When requested, the owner must give the Housing Commission information on rents charged by the owner for other units in the premises or elsewhere.</u></p> <p><b>PHA RENT REASONABLENESS METHODOLOGY</b></p> <p><b><u>How Market Data is Collected</u></b></p> <p><u>The PHA will collect and maintain data on unit information and market rents in the PHA's jurisdiction internally or by utilizing a contractor. Information sources may include newspapers, realtors, appraisers, professional associations, market surveys, landlords, GoSection8.com and</u></p>	<p>Language clarified to ensure rents are approved based on market conditions.</p> <p>Language is added to clarify policy.</p> <p>Process revised to use a Section 8 rent reasonableness database.</p>

Current	Revision	Explanation
<p>professional associations, inquiries of owners, market surveys, and other available sources.</p> <p>The area to be used to determine unit rent reasonableness must be within the Housing Commission's jurisdiction and within the same sub-regional area.</p> <p>Comparables kept in the automated database may be updated annually based on the percentage of rental market rent increases or decreases as provided by such services as the San Diego Apartment Owners Association and Market Point Realty Advisors.</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>Also, the Housing Commission refers to the database for two comparables for each move-in and annual reexamination inspection and the average amount of the two comparables is used to determine the maximum reasonable rent. If the need arises, the owner may submit information on two unassisted units from different complexes, preferably under different ownership, within a 2-mile radius.</p> <p>If there are no available comparables with the same number of bedrooms or bathrooms, dollar adjustments will be made based on market conditions.</p> <p>The Housing Commission may use a point</p>	<p>other available sources. <u>Unit data will include the location, quality, size, and age of the unit, as well as amenities, housing services, maintenance and utilities to be provided by the owner. Data will be updated on an ongoing basis and rent information that is more than 12 months old will not be used to determine rent reasonableness.</u></p> <p><b><u>How Rents are Determined</u></b></p> <p><u>At initial move-in and each rent increase request SDHC uses a unit-to-unit comparison, by which the rent for the assisted unit is directly compared to the rents for one or more unassisted units selected as comparables within the same market area and generally within a two (2) mile radius. Maps will be used to identify the unsubsidized units in closest proximity to the subject unit, and unit data information will be used to select the most similar units.</u></p> <p><u>In comparing rents, the SDHC will take into account critical market factors that impact rent, including the location, quality, size, unit type, and age of the contract unit, as well as any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease. <i>Note:</i> The age of the unit rarely impacts the cost of rental housing in the San Diego market.</u></p> <p><u>Where comparable units differ from the assisted unit, SDHC will determine whether those differences impact rent. Where they do, the SDHC will adjust the rental value of the comparable units, up or down, based on the market value of these factors. The rent for the</u></p>	

Current	Revision	Explanation
<p>system or a dollar adjustment system, or both, to compare size, quality, utilities, amenities, maintenance services and housing services.</p> <p>When requesting a rent increase, the owner must provide the addresses for two units in the same complex, which have the same number of bedrooms, if present, that rent for the same amount or more. If an owner currently has a lower rental rate for other unassisted comparable units in the same complex, but will raise the rental rate for all new vacancies, the owner's certification will be acceptable to approve the requested rent.</p>	<p>assisted unit will be compared to the <u>adjusted rents for the comparable units, enabling a fair, accurate, market-based determination of rent reasonableness.</u></p> <p><u>After examining and analyzing a comparison of the assisted unit and comparable units, the professional judgment of SDHC staff is the final determinant of rent reasonableness. SDHC will consider the degree of similarity with the comparable units, whether the comparable units are a good match for the assisted unit and the level of adjustment that was needed to make the comparables "fit" the subject unit. SDHC will also consider the average of the adjusted monthly rents of the comparable units as an estimate of what might be a reasonable market rent, although the average is not intended to set an upper or lower limit on an approvable rent. The approved rent will be based on the general open market for comparable rentals and not based on the few exceptions that may rent for more.</u></p> <p><u>SDHC will notify the owner of the rent that can be approved based upon its analysis of rents for comparable units. If the owner disagrees with this analysis, the owner may submit information for three (3) comparable unassisted units within a two (2) mile radius from the assisted unit. These unassisted units must be from different complexes and preferably under different ownership. SDHC will consider this information and notify the owner of a final rent determination.</u></p> <p><u>When requesting a rent increase, the owner must</u></p>	

Current	Revision	Explanation
<p>Chapter 10</p>	<p>provide the addresses for two (2) unassisted units in the same complex, which have the same number of bedrooms and which rent for the requested amount or more. If an owner currently has a lower rental rate for other unassisted comparable units in the same complex, but will raise the rental rate for all new vacancies, the owner's certification will be acceptable to approve the requested rent amount.</p> <p><b>D. <u>MOVING FORWARD: INCREASING THE PAYMENT STANDARDS IN LOW-POVERTY AREAS</u></b></p> <p>In an effort to enhance opportunities for employment and education and to increase housing choices for low-income participants, the Housing Commission may apply higher payment standards in targeted low-poverty neighborhoods. Payment standards may be set below or above the 90 percent to 110 percent range of the FMR without HUD approval.</p> <p><b>Chapter 10</b></p> <p><b>B. <u>MOVING FORWARD: INSPECTIONS AND RENT REASONABLENESS FOR HOUSING COMMISSION OWNED PROPERTIES</u></b></p> <p>The Housing Commission will utilize its own staff to perform the required Housing Quality Standards inspections. These inspections will be conducted in conformance with the Housing</p>	<p>New language added to reflect Moving Forward policy.</p> <p>New language added to reflect Moving Forward policy.</p>

Current	Revision	Explanation
<p><b>F. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO HQS</b></p> <p>The Housing Commission applies the HUD acceptability criteria with the additions described below.</p> <p>Exterior: Street number must be present and visible from</p>	<p>Quality Standard criteria, and will include a system of random quality control inspections to ensure compliance.</p> <p>As vacancies occur within the Housing Commission-owned properties, the Rental Assistance Department will conduct rent reasonableness determinations using the standard currently used to perform all other HCV rent reasonableness determinations.</p> <p><b><u>D. MOVING FORWARD: BIENNIAL HQS INSPECTIONS</u></b></p> <p>Units that have passed two consecutive initial and/or annual inspections on the first inspection appointment will be eligible to be inspected every two years.</p> <p>Units that qualify for an annual inspection waiver will be subject to random inspections in the "off" year to ensure that they are maintained to minimum standards and that this activity continues to be viable.</p> <p>Participants will retain the right to request special inspections at any time in accordance with the Special Inspection policy.</p> <p><b><u>F. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO HQS</u></b></p> <p>The Housing Commission applies the HUD acceptability criteria with the additions described below.</p> <ul style="list-style-type: none"> <li>• <u>No graffiti allowed on exterior of house/rental complex, sidewalks, and/or fences.</u></li> </ul>	<p>New language added to reflect Moving Forward policy.</p> <p>The current criteria remain the same. The revisions are being added to the existing criteria.</p> <p>Graffiti is the most common type of</p>



Current	Revision	Explanation
<p>the street</p> <p>Interior: The owner may not access any portion of the assisted unit for their personal use.</p> <p>Garages: Garage attached to the unit with access to the assisted unit is part of the assisted unit.</p> <p>Doors: All exterior doors must be lockable, have no holes, have all trim intact, and have a threshold. All interior doors must open without the use of a key.</p> <p>Security: If window security bars or security screens are present on emergency exit window, they must be equipped with a fluid motion quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.</p> <p>Hot Water Heater: The pressure relief valve discharge line must be directed downward 6" to 24" from the ground or platform. If the water heater is inside the unit, the discharge line must be vented to the outside or downward 6" to 24" from an approved drainage outlet.</p>	<ul style="list-style-type: none"> <li>• <u>One operable window in each room must have a screen in good condition</u></li> <li>• <u>No excessive chipping and peeling paint, excessive defined as more than 15% of the wall or a component (windowsill, window frame, doorframe, etc.) has deteriorated paint.</u></li> <li>• <u>Soiled floor coverings that are serious health hazards (e.g. mildewed, severely soiled with food, animal or human urine/feces, etc.)</u></li> <li>• <u>The water heater must have a discharge line the same diameter as the pressure relief valve. The discharge line must be directed downwards to the floor, to a drain, or to the outside, reaching 6 – 24 inches from the ground, and must be</u></li> </ul>	<p>vandalism according to the Bureau of Justice Statistics. About 80 percent of graffiti is gang or tagger graffiti. Graffiti is a sign of decay and makes people feel that their neighborhood is being lost to gangs and crime. It hurts property values and frightens away businesses. The best way to prevent graffiti is to remove it as quickly as possible. San Diego Municipal Code 54.0401 (b) declares graffiti is obnoxious and constitutes both a public nuisance and a crime, and that it must be abated.</p> <p>A screened window permits fresh airflow while preventing insects, leaves, debris, birds, and other animals from entering the unit.</p> <p>Guards against chipping and peeling paint that results in unhealthy dust/pollutants being more prevalent in the air</p> <p>Clarifies gray areas in HQS guidelines regarding when a floor covering is no longer "decent, safe, and sanitary."</p> <p>Updating language with current requirements.</p>

Current	Revision	Explanation
<p><b>H. CONSEQUENCES IF OWNER IS RESPONSIBLE</b></p> <p><b>Lead Based Paint</b></p> <p>If the owner is not in compliance with lead based paint requirements the HAP contract will be terminated.</p>	<p>hard copper, galvanized steel, or CPVC pipe marked "4120 100 PSI."</p> <ul style="list-style-type: none"> <li>• <u>A bedroom must have a floor area of not less than seventy (70) square feet.</u></li> <li>• <u>No simple bolt, barrel, or hasp locks allowed on outside of interior doors, preventing exit from a room.</u></li> <li>• <u>Tenant preference to substitute a microwave oven in the place of an owner or tenant supplied oven and stove will be allowed. A microwave oven will be considered passed if the microwave is in a safe and working condition.</u></li> </ul>	<p>2001 California Building Code states that habitable rooms, except kitchens, shall have any area of not less than 70 square feet. No habitable room other than a kitchen shall be less than 7 feet in any dimension. This avoids makeshift bedrooms with room to fit a bed and no space to move around or place furniture.</p> <p>Revising current language "All interior doors must open without the use of a key" for clarification. Tenants need to be able to exit rooms in case of fire.</p> <p>Provides tenant more flexibility.</p>
<p><b>K. CONSEQUENCES IF OWNER IS RESPONSIBLE</b></p> <p><b>Lead Based Paint (LBP)</b></p> <p>If the owner is not in compliance with lead based paint requirements the HAP contract will be terminated.</p>	<p><u>HUD requires that the unit fail inspection under the Lead-Based Paint guidelines when there is deteriorated paint and the unit was built prior to 1978, is occupied by a child under the age of six</u></p>	<p>Specifies timeframes for completing the lead abatement process.</p>

Current	Revision	Explanation
	<p>and has not been certified lead-based paint free. Deteriorated paint includes any painted surface that is peeling, chipping, chalking, damaged or otherwise separated from the painted surface.</p> <p>SDHC will notify the owner those corrections must be made utilizing Lead Safe Work Practices and a clearance test must be provided to the Housing Commission within the required timeframe.</p> <p>For units that are currently unassisted, the deteriorated paint and clearance must be completed before we can enter into a contract.</p> <p>On currently assisted units, the repairs/corrections and clearance must be completed within 30 days of the visual inspection. Extensions of the time may be granted for <i>reasonable cause</i>, but per regulations, the extension cannot extend beyond 90 days after the date of notification to the owner of the results of the visual inspection.</p> <p>The HAP contract will be terminated if the timeframes are not met.</p> <p><b><u>N. MOVING FORWARD: STANDARDIZED UTILITY ALLOWANCES</u></b></p> <p>Utility allowances currently vary by building type, bedroom size and type of fuel/energy used.</p>	<p>New language added to reflect the Moving Forward policy.</p>

Current	Revision	Explanation
<p><b>Chapter 11</b></p> <p><b>C. TERMINATION OF THE CONTRACT</b></p> <p>The Housing Commission may also terminate the contract if:</p> <p>The family is required to move from a</p>	<p>Instead, the Housing Commission will annually set two utility schedules.</p> <p>The two schedules will provide each household responsible for tenant supplied utilities with the average allowance based upon the unit bedroom size. One schedule will be applied for households that have sewer/water included in the utility allowance and one for those that do not have sewer/water included.</p> <p>Standardized utility allowances will only apply to those households that are currently receiving a utility allowance.</p> <p><b><u>Hardship Policy for Standardized Utility Allowance Structure</u></b></p> <p>The hardship policy allows families who apply and qualify for a hardship will see only a \$50 increase in family share at their upcoming reexamination. Only families who would see an increase of more than \$50 as a direct result of the new utility allowance structure will qualify.</p> <p><b>Chapter 11</b></p> <p><b>C. TERMINATION OF THE CONTRACT</b></p> <p>The Housing Commission may also terminate the contract if:</p>	

Current	Revision	Explanation
<p>unit when the unit does not meet the HQS space standards because of an increase in family size or a change in family composition;</p> <p>Funding is no longer available under the ACC.</p> <p>The contract will terminate automatically if 180 days have passed since the last housing assistance payment to the owner.</p> <p><b>Chapter 13</b></p>	<ul style="list-style-type: none"> <li>The family is required to move from a unit when the unit does not meet the HQS space standards because of an increase in family size or a change in family composition;</li> <li>When funding is no longer available under the ACC, the contracts of the longest served non-elderly or disabled households will be terminated. When the program is over leased, the contracts of the participants with the lowest HAP's will be terminated. In both cases, the family's eligibility will be suspended until the funding shortfall or the over leased status is no longer applicable, at which time the family will be issued a voucher.</li> </ul> <p><b>Chapter 13</b></p> <p><b><u>SECTION 3 MOVING FORWARD: PROJECT BASED UNITS</u></b></p> <p><b>Introduction</b></p> <p>Utilizing the flexibility the Moving to Work (MTW) program provides, the Housing Commission intends to establish a Project-Based Voucher (PBV) Program that will serve the needs of San Diego's low-income residents</p>	<p>Paragraph now clarifies policy relating to underfunding of the program or when the program becomes over leased.</p> <p>New language added to reflect Moving Forward policy.</p>

Current	Revision	Explanation
	<p>who are in need of housing while also serving the needs of the community.</p> <p>Under MTW, the Housing Commission intends to:</p> <ol style="list-style-type: none"> <li>1. Collaborate with local developers and non-profit housing providers by creating long-term subsidies by means of project-based vouchers, in exchange for the creation of affordable housing for low-income families and individuals and transitional housing for homeless families and individuals.</li> <li>2. Increase the range of options available to low-income households living in high-poverty areas.</li> <li>3. Designate up to 3% of the Housing Commission's voucher allocation to project-based developments</li> <li>4. Expand the use of project-based vouchers by increasing the permissible percentage of subsidized units in a single development. The Housing Commission will allow more than 25% of the units in a development to be project-based when this will result in the preservation and/or development of affordable housing and does not result in an increased concentration of low-income families.</li> <li>5. Utilize project-based vouchers within Housing Commission-owned properties. The utilization of project-based vouchers</li> </ol>	

Current	Revision	Explanation
	<p>is intended to allow additional affordable units to be produced by leveraging cash flow.</p> <p>6. In conjunction with HUD's Neighborhood Stabilization Program, the Housing Commission may apply creative measures utilizing Project-based vouchers to increase housing opportunities in vacant and foreclosed properties in impacted areas of the community.</p> <p>7. Allow for project-specific waiting lists maintained by the owners or non-profit providers in compliance with agency standards.</p> <p>8. Allow project-based rents to exceed tax-credit rents.</p> <p>9. Goals and Objectives</p> <p>This policy identifies three local issues the Housing Commission is interested in addressing through this program including:</p> <p><i>Category 1: Preserving and Expanding Stock and Deconcentrating Poverty.</i> Utilizing MTW authority, the Housing Commission is moving aggressively to preserve the viability of its housing inventory and expanding its affordable housing stock. Project-based assistance will play a critical role in this endeavor. By project-basing subsidies at various sites, the Housing Commission ensures affordable housing remains a lasting and constructive community resource. Leveraging the</p>	

Current	Revision	Explanation
	<p>guaranteed cash flow will allow additional units to be developed or acquired.</p> <p><i>Category 2: Ending Chronic Homelessness.</i> The project-basing of Section 8 vouchers in tandem with the provision of appropriate supportive services targets a crucial need in San Diego. MTW provides the Housing Commission with the flexibility it needs to make this effort a success. Working closely with local partners, the Housing Commission is bundling housing and services to successfully bring homeless families and individuals off the street and into supportive environments.</p> <p><i>Category 3: The Creation and Preservation of Affordable Housing.</i> The Housing Commission will collaborate with local developers and non-profit housing providers by offering long-term subsidies by means of project-based vouchers. In exchange, they will create or preserve affordable housing opportunities for low-income families and individuals. The Housing Commission may apply creative measures, in conjunction with the Neighborhood Stabilization Program, to increase housing opportunities in vacant and foreclosed properties in impacted areas of the community.</p>	
<p><b>SECTION 4 Disaster Programs</b></p>	<p><b>SECTION 4 Disaster Programs</b></p> <p><u>The Katrina Disaster Housing Assistance Program (KDHAAP) was established on October 1, 2005 for the purpose of providing up to 18 months of housing assistance to select groups of</u></p>	<p>Added language for Disaster Program.</p>



Current	Revision	Explanation
<p><b>SECTION 5 Veterans Affairs Supportive Housing (VASH)</b></p>	<p>people affected by Hurricane Katrina. <u>KDHAP was a joint initiative between HUD and the Federal Emergency Management Agency (FEMA) to aid pre-disaster HUS-assisted and homeless families that were affected by Hurricane Katrina. On March 1, 2007 those being assisted through KDHAP were converted to the Disaster Voucher Program (DVP). The program ended December 31, 2007.</u></p> <p><u>The Disaster Housing Assistance Program (DHAP) was enacted through an interagency agreement between HUD and FEMA in July 2007 to commence in September 2007. The program provided housing assistance and supportive services to families impacted by Hurricane Katrina and Rita that had been receiving assistance through FEMA. These families are referred to the local participating Phase to process and provide assistance. The program would provide assistance until further notice from HUD. The San Diego Housing Commission has implemented DHAP and reserves the option to implement and other disaster programs that are fully funded, at a later time. The San Diego Housing Commission has adopted the published guidelines and is developing separate policy documents for DHAP.</u></p> <p><b>SECTION 5 Veterans Affairs Supportive Housing (VASH)</b></p> <p><u>The HUD-VASH program combines HUD HCV rental assistance for homeless veterans with case management and clinical services</u></p>	<p>Added language for VASH program</p>

Current	Revision	Explanation
	<p>provided by the Veterans Affairs at its medical centers and in the community.</p> <p>HUD awarded funding for approximately 10,000 HUD-VASH vouchers in May 2008 and the San Diego Housing Commission has adopted the published guidelines and is developing separate policy documents for VASH.</p> <p>Generally, the HUD-VASH HCV program will be administered in accordance with regular HCV program requirements. However, the Act allows HUD to waive or specify alternative requirements for any provision of any statute or regulation that HUD administers in connection with this program in order to effectively deliver and administer HUD-VASH voucher assistance.</p>	