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Agenda  
Lansing Housing Commission  
Annual Plan Public Hearing  
March 29, 2018

Call to Order

1. Informational Items.

- a. Proposed Administrative Plan Changes – Kim Shirey
- b. Proposed ACOP Plan Changes – LIPH Staff

2. Public Comment

3. Action Items:

Resolution 1290-Approval of 2018-2019 Annual Plan-Martell Armstrong

4. Adjournment



Summary of Proposed Changes  
LHC ADMINISTRATIVE Plan  
February 2018

Chapter 2:

2-II.B. DEFINITION OF REASONABLE ACCOMMODATION

Types of Reasonable Accommodations (Page 2-6 and 2-7)

Current Plan:

When needed, the LHC must modify normal procedures to accommodate the needs of a person with disabilities. Examples include:

Permitting applications and reexaminations to be completed by mail Conducting home visits

Using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside the PHA range) if the PHA determines this is necessary to enable a person with disabilities to obtain a suitable housing unit

Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit

Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff

Displaying posters and other housing information in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair

Proposed Change:

When needed, the LHC must modify normal procedures to accommodate the needs of a person with disabilities. Examples include:

Permitting applications and reexaminations to be completed by mail Conducting home visits

Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit

Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff

Displaying posters and other housing information in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair

Providing voucher extensions beyond the 120 days should circumstances allow.

When determining who should receive extensions, consider the following: • The family's level of effort to find a suitable unit during the initial term. Did the family contact owners and real estate companies, search newspaper listings, explore neighborhoods for "For Rent" signs, check with local churches, and other community organizations? • Whether there is a reasonable possibility that the family may, with additional advice and assistance,

find a suitable unit; • Level of support services requested by and provided to the family; • Extenuating circumstances that prevented the family from finding a unit, such as: - Serious illness in the family; - Death in the family; - Family emergency; - Obstacles due to employment;

Whether the family has already submitted requests for approval of the tenancy for units that were not approved by the PHA; and - Whether family size or other special requirements made finding a unit difficult.

## 2-II.C. REQUEST FOR AN ACCOMMODATION (page 2-6)

### Current Plan

#### LHC Standard Operating Policy

The LHC will encourage the family to make its request in writing using a reasonable accommodation request form. However, the LHC will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted. LHC will consider these additional types of reasonable accommodations: ☐ Extra bedroom to house medical equipment ☐ Bedroom Allowances for Live in Aides ☐ Separate bedrooms for individuals with medical problems ☐ Permit households to lease units from relatives

### Proposed Change

#### LHC Standard Operating Policy

The LHC will encourage the family to make its request in writing using a reasonable accommodation request form. However, the LHC will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted. **LHC will consider these additional types of reasonable accommodations:** ☐ Extra bedroom to house medical equipment (Medical Equipment to be verified at biennial) inspection ☐ Bedroom Allowances for Live in Aides ☐ Separate bedrooms for individuals with medical problems ☐ Permit households to lease units from relatives provided that the housing unit has been specifically altered to meet accessibility needs for a disabled individual.

## **EXHIBIT 2-1: DEFINITION OF A PERSON WITH A DISABILITY UNDER FEDERAL CIVIL RIGHTS LAWS [24 CFR Parts 8.3 and 100.201] (page 2-12)**

### Current Plan:

The definition of a person with disabilities does not include:

Current illegal drug users

People whose alcohol use interferes with the rights of others

Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the HCV program

### Proposed Change:

The definition of a person with disabilities does not include:

current illegal drug users

People whose alcohol use interferes with the rights of others

Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the HCV program

Juvenile Offenders

Sex Offenders

Chapter 3:

3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY

(page 3-6)

### **Joint Custody of Dependents**

Current Plan

#### LHC Standard Operating Policy

Dependents that are subject to a joint custody arrangement are considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time or are otherwise designated by a Joint Parenting Agreement to the parent who maintains primary residence of the child or children. Individuals with joint custody arrangements entered into in a state other than Michigan may be required to provide documentation of joint custody and/or evidence of the primary residence of a child or the children.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the LHC will make the determination based on available documents such as court orders, school enrollment records, benefit/subsidy records, or an IRS return showing which family has claimed the child for income tax purposes.

#### **Proposed Change**

Dependents that are subject to a joint custody arrangement are considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time or are otherwise designated by a Joint Parenting Agreement to the parent who maintains primary residence of the child or children. Individuals with joint custody arrangements entered into in a state other than Michigan may be required to provide documentation of joint custody and/or evidence of the primary residence of a child or the children. If court order only awards 50% custody one of the following must also be provided: DHHS award letter showing medical, food or cash benefits for child in question, medical or school records, or a notarized statement from the non-custodial parent.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the LHC will make the determination based on available documents such as court orders, school enrollment records, benefit/subsidy records.

### **3-I.L. ABSENT FAMILY MEMBERS**

#### **Current Plan**

#### **Verification of Permanent Absence of a Family Member (3-9 /3-10)**

If the family reports an adult household member has left the household or is permanently absent, the following are considered verifications of absence:

- ☐ Proof of death;
- ☐ Court papers when a husband or wife verifying divorce (action) or legal separation;
- ☐ Protection/ Restraining Order obtained by one family member against another;

#### **Proposed Change**

If the family reports an adult household member has left the household or is permanently absent, the following are considered verifications of absence:

- ☐ Proof of death;
- ☐ Protection/ Restraining Order obtained by one family member against another;
  - Copy of state issued picture ID and one of the following:
    - DHS benefit letter
    - Paystub
    - Utility bill
  - Copy of current executed lease showing current address
  - Copy of a notarized statement from the person you are currently residing with and one of the following:
    - DHS benefit letter
    - Paystub
    - Utility bill

### **Absent Head, Spouse, or Co-head (page 3-10)**

#### **Current Plan**

An employed head, spouse, or Co-Head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

#### **Proposed Change**

An employed head, spouse, or Co-Head absent from the unit more than 30 consecutive days due to employment will continue to be considered a family member unless they provide proof that they have established a separate residence by providing the following documentation:

- Copy of state issued picture ID and one of the following:
  - DHS benefit letter
  - Paystub
  - Utility bill
- Copy of current executed lease showing current address
- Copy of a notarized statement from the person you are currently residing with and one of the following:
  - DHS benefit letter
  - Paystub
  - Utility bill

### **3-I.M. LIVE-IN AIDE**

#### **Current Plan (page 3-12)**

*Live-in aide* means a person who resides with one or more elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the persons, (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].

#### **LHC Standard Operating Procedure**

A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, licensed professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new, written request-subject to LHC verification-at each annual reexamination.

Families must report when the live-in aide is no longer part of the household within 30 days of the event. The family will be allowed 60 days to search for, select, and secure LHC approval of a replacement live-in aide. If no new live in aide is approved within 60 days new documentation from a medical professional must be supplied.

#### **Proposed Change**

#### **LHC Standard Operating Policy**

A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, licensed professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new, written request-subject to LHC verification-at each annual reexamination.

Families must report when the live-in aide is no longer part of the household within 30 days of the event. The family will be allowed 60 days to search for, select, and secure LHC approval of a replacement live-in aide. If no new live in aide is approved within 60 days new documentation from a medical professional must be supplied.

Live-in aides:

Are considered a member of the household for live-in aide purposes only. Live in aides are not a member of the family for determining the rental rate member and Live in aides do not qualify as a remaining member of a qualified household. He or she is not considered eligible to receive the benefits of a housing choice voucher.

Must utilize the rental unit as his or her sole residence during the time he or she is certified as the participant's live-in aide;

Must comply with citizenship requirements

Must complete a live-in aide certification form

### **3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(a)] (page 3-22)**

#### **Current Plan**

HUD permits, but does not require, the PHA to deny assistance if the PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.

Any member of the household has been evicted from federally-assisted housing in the last 3 years for drug-related criminal activity. HUD permits, but does not require, the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household).

#### **LHC Standard Operating Procedure**

The LHC will admit an otherwise-eligible family who was evicted from federally- assisted housing within the past 7 years for drug-related criminal activity, if the LHC is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the LHC, or the person who committed the crime, is no longer living in the household.

The PHA determines that any household member is currently engaged in the use of illegal drugs. LHC defines *currently engaged in* is defined as any use of illegal drugs during the previous six months.

#### **Proposed Change**

#### **LHC Standard Operating Procedure**

If any household member is currently engaged in, been released from incarceration, parole or probation, or has engaged in any of the following criminal activities, within the past five years, the family may be denied assistance.

Evidence of such criminal activity includes, but is not limited to:

Any conviction for drug-related or violent criminal activity or release from incarceration, parole or probation from such activities within the past 5 years.

Any arrests for drug-related or violent criminal activity or release from incarceration,

parole or probation from such activities within the past 5 years.

Any record of eviction from public or privately-owned housing as a result of criminal activity or release from incarceration, parole or probation from such activities within the past 5 years.

### **Previous Behavior in Assisted Housing [24 CFR 982.552(c)]**

Current Plan:

HUD authorizes the PHA to deny assistance based on the family's previous behavior in assisted housing: LHC Standard Operating Procedure

The LHC **will not** deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program. The LHC **will** deny assistance to an applicant family if:

The family does not provide information that the LHC or HUD determines is necessary in the administration of the program.

The family does not provide complete and true information to the LHC.

Any family member has been evicted from federally-assisted housing (Public Housing, Housing Choice Voucher, and Project Based Section 8) in the last five years.

Any LHC has ever terminated assistance under the program for any member of the family.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

The family owes rent or other amounts to any PHA in connection with the HCV, Certificate, Project Based Section 8, Moderate Rehabilitation or public housing programs, unless the family repays the full amount of the debt prior to being selected from the waiting list.

If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other

amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.

The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.



HUD authorizes the PHA to deny assistance based on the family's previous behavior in assisted housing:

#### Proposed Change

#### LHC Standard Operating Procedure:

HUD authorizes the PHA to deny assistance based on the family's previous behavior in assisted housing:

#### LHC Standard Operating Procedure

The LHC **will not** deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency

The LHC **will** deny assistance to an applicant family if:

The family does not provide information that the LHC or HUD determines is necessary in the administration of the program.

The family does not provide complete and true information to the LHC.

Any family member has been evicted from federally-assisted housing (Public Housing, Housing Choice Voucher, and Project Based Section 8) in the last five years.

Any LHC has ever terminated assistance under the program for any member of the family.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

The family owes rent or other amounts to any PHA in connection with the HCV, Certificate, Project Based Section 8, Moderate Rehabilitation or public housing programs, unless the family repays the full amount of the debt prior to being selected from the waiting list.

If the family has not reimbursed any PHA or owner for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.

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The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

*Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

*Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

## Chapter 4

### 4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES (page 4-6)

While a family is on the waiting list, the family must immediately inform the LHC of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

While a family is on the waiting list, the family must immediately inform the LHC of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted via [waitlistcheck.com](http://waitlistcheck.com).

### Change 4-11. F: UPDATING THE WAITING LIST (page 4-6)

#### Current Plan

#### LHC Standard Operating Procedure

The waiting list will be updated periodically to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the LHC will send an e-mail update request or a first letter via class mail to each family on the waiting list to determine whether the family continues to be interested in, the program. This update request will be sent to the last e-mail address, street address and address of contacts listed that the LHC has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by e-mail, by regular mail, or by fax. Responses should be postmarked or received by the LHC not later than 15 business days from the date of the LHC letter.

If the family fails to respond within 15 business days of the 1<sup>st</sup> class mail date, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the Executive Director may reinstate the family if s/he determines the lack of response was due to LHC error, a disability or to circumstances beyond the family's control.

#### Proposed Change

### LHC Standard Operating Policy

The waiting list will be updated periodically to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the LHC will send a first letter via class mail to each family on the waiting list to determine whether the family continues to be interested in, the program. This update request will be sent to the last known street address and address of contacts listed that the LHC has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by e-mail, by regular mail, or by fax. Responses should be postmarked or received by the LHC not later than 15 business days from the date of the LHC letter.

If the family fails to respond within 15 business days of the 1<sup>st</sup> class mail date, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the Executive Director may reinstate the family if s/he determines the lack of response was due to LHC error, a disability or to circumstances beyond the family's control.

### **Change 4-III.D. NOTIFICATION OF SELECTION (page 4-11)**

#### **Current Plan**

LHC generally does not conduct face-to-face interviews to collect the application and supporting documents. Families are required to return the application and supporting documents by the deadline indicated in the letter. LHC will notify the family, of the following, by first class mail no later than 10 business days from the date of selection from the waiting list of any additional or missing documentation that is needed. Failure to supply the requested documents within the given deadlines will result in being placed inactive on the HCV waiting list.

#### **Proposed Change**

LHC generally does not conduct face-to-face interviews to collect the application and supporting documents. Families are required to return the application and supporting documents by the deadline indicated in the letter. LHC will notify the family, of the following, by first class mail no later than 30 days from the date of selection from the waiting list of any additional or missing documentation that is needed. Failure to supply the requested documents within the given deadlines will result in being placed inactive on the HCV waiting list.

## Chapter 5

### **Change 5.I.C Time Frames for Reporting Changes Required By Family Obligations (page 5-4)**

#### Current Plan

##### LHC Standard Operating Procedure

When family obligations require the family to respond to a request or notify the LHC of a change, notifying the LHC of the request or change within 30 business days is considered prompt notice. Changes must be reported within 30 business days from the start or stop date of the reported change. For example: An income change must be reported within 30 business days from the date of hire or termination, not the date of first or last check.

When a family is required to provide notice to the LHC, the notice must be in writing.

### **Change 5.I.C Family Obligations (page 5-6)**

##### LHC Standard Operating Procedure

Damages beyond normal wear and tear will be considered to be damages which could be assessed against the security deposit and could result in repayment to the landlord for accessed damages, or termination. Removal of smoke detectors, and/ or batteries from a smoke detector will result in termination of assistance if not corrected within 24 hours of the violation.

The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.

Should a landlord issue a court ordered money judgment within 90 days of move out, LHC will issue a 60-day termination notice to the voucher holder. That voucher holder will have 60 days to pay off the balance owed to the previous landlord or their assistance will be terminated. A receipt of payment or a written notarized statement from the landlord must be provided to stop termination. LHC will also accept a receipt showing the payment has been escrowed through the local tenant/landlord courts.

The family must not commit any serious or repeated violation of the lease.

#### **Proposed Change**

##### LHC Standard Operating Policy

##### LHC Standard Operating Procedure

Damages beyond normal wear and tear will be considered to be damages which could be assessed against the security deposit and could result in repayment to the landlord for accessed damages, or termination. Removal of smoke detectors, and/ or batteries from a smoke detector will result in termination of assistance if not corrected within 24 hours of the violation.

The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.

Should a landlord issue a court ordered judgment within 60 days of move out, LHC will issue a 60-day termination notice to the voucher holder. That voucher holder will have 60 days to pay off the balance owed to the previous landlord or their assistance will be terminated. A receipt of payment or a written notarized statement from the landlord must be provided to stop termination. LHC will also accept a receipt showing the payment has been escrowed through the local tenant/landlord courts.  
The family must not commit any serious or repeated violation of the lease.  
The family may not have a judgement upon placing a notice to vacate.

## **Change 5-II. B DETERMINING FAMILY UNIT (VOUCHER) SIZE (page 5-10)**

### **Current Plan**

#### **LHC Standard Operating Procedure**

The LHC will assign one bedroom for each two persons within the household, except in the following circumstances:

Live-in aides will be allocated a separate bedroom.

A court order that indicates an additional bedroom is necessary

The PHA will reference the following chart in determining the appropriate voucher size for a family:

### **Proposed Change**

#### **LHC Standard Operating Policy**

LHC will assign one bedroom for each head of household/spouse/co head/domestic partner; and then one additional bedroom for every two persons within the household,

except in the following circumstances:

Live-in aides will be allocated a separate bedroom.

Single person families will be allocated one bedroom.

LHC approved reasonable accommodations for additional bedrooms.

A family that consists of a pregnant woman (with no other person) will be allocated two bedrooms

## **Change 5.II.E Extensions of Voucher Term (Page 5-12)**

#### **LHC Standard Operating Procedure**

The LHC will automatically approve one 30-day.

The LHC will approve additional extensions only in the following circumstances:

It is necessary as a reasonable accommodation for a person with disabilities.

It is necessary due to reasons beyond the family's control, as determined by the LHC. Following is a list of extenuating circumstances that the LHC may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted: Serious illness or death in the family; Other family emergency; Obstacles due to employment; Whether the family has already submitted requests for tenancy approval that were not approved by the LHC Whether family size or other special requirements make finding a unit difficult

#### Proposed Change

#### LHC Standard Operating Policy

The LHC will approve additional extensions only in the following circumstances:

It is necessary as a reasonable accommodation for a person with disabilities.

It is necessary due to reasons beyond the family's control, as determined by the LHC. Following is a list of extenuating circumstances that the LHC may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted: Serious illness or death in the family; Other family emergency; Obstacles due to employment; Whether the family has already submitted requests for tenancy approval that were not approved by the LHC Whether family size or other special requirements make finding a unit difficult

#### Chapter 6

#### Joint Custody of Dependents (page 6-4)

#### Current

#### LHC Standard Operating Procedure

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the LHC will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes.

#### Proposed Change

#### LHC Standard Operating Procedure

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 51 percent or more of the time. If court order only awards 50% custody one of the following must also be provided: DHHS award letter showing medical, food or cash benefits for child in question, medical or school records, or a notarized statement from the non-custodial parent. Removed IRS documents required.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the LHC will make the determination based on available documents such as court orders.

#### Lifetime Limitations page 6-11

##### Current Plan

The EID has a four-year(48-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance.

##### LHC Standard Operating Procedure

During the 48-month eligibility period, the LHC will schedule and conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

##### Proposed Change

The EID has a two-year(12-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance.

##### LHC Standard Operating Policy

During the 12-month eligibility period, the LHC will schedule and conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

#### 6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

##### Alimony and Child Support

##### Current Plan

The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.

##### LHC Standard Operating procedure

The LHC will count all support received over an annualized one-year period, unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made

reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5- 47].

Families must supply a one-year child support printout for all annual reexaminations. The Local Friend of the Court will only supply a one-year printout annually for housing purposes without cost to the families. Therefore, Relia card printouts, or bank statements showing child support payments can be used for interims or if a printout has been obtained in the last three months.

Payments paid directly to the family without the involvement of the local Friend of the Court is countable income.

#### Proposed Change

The LHC will count all support received over an annualized one-year period, unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5- 47].

Families must supply a one-year child support printout for all annual reexaminations. The Local Friend of the Court will only supply a one-year printout annually for housing purposes without cost to the families. Therefore, MiCase printout, Relia card printouts, or bank statements showing child support payments can be used for interims or if a printout has been obtained in the last three months.

Payments paid directly to the family without the involvement of the local Friend of the Court is countable income.

Any payments more than two times the ordered monthly amount is considered a lump sum payment and will be counted for 12 months

#### Chapter 7

##### **7-II. D – Separation or Divorce (page 7-11)**

##### **Current Plan**

##### **LHC Standard Operating Procedure**

The LHC will require the family to provide documents pertaining to the divorce, or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

If no court document is available, documentation of the former spouse's residency will be required. Acceptable documents are: a driver's license showing a current address plus of the following a current piece of mail, a utility bill, or notarized statement of residency. An executed lease agreement showing current residency may also be provided.

##### **Proposed Change**

##### **LHC Standard Operating Policy**



The LHC will require the family to provide documents pertaining to the divorce, or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

If no court document is available, documentation of the former spouse's residency will be required. Acceptable documents are: a legal I.D. showing a current address plus of the following a current piece of mail, a utility bill, or notarized statement of residency. An executed lease agreement showing current residency may also be provided. If none of these are available, then self-certification by the Head of Household will be accepted.

Current Plan

### **Absence of Adult Member**

#### **LHC Standard Operating Procedure**

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family. Acceptable documents are: a driver's license showing a current address plus of the following a current piece of mail, a utility bill, or notarized statement of residency. An executed lease agreement showing current residency may also be provided.

Proposed Plan

#### **LHC Standard Operating Policy**

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family. Acceptable documents are: a legal I.D. showing a current address plus of the following a current piece of mail, a utility bill, or notarized statement of residency. An executed lease agreement showing current residency may also be provided. If none of these are available, then self-certification by the Head of Household will be accepted.

### **Chapter 7-II. F Family Members Not Receiving SSA Disability Benefits (page 7-15)**

Current Plan

#### **LHC Standard Operating Procedure**

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

Proposed Change

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD

definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

Page 7-18

## **Chapter 7-III.D ALIMONY OR CHILD SUPPORT (7-18)**

### **Current Plan**

#### **LHC Standard Operating Procedure**

The LHC will require verification for alimony and child support at admission, and during each annual re-examination, or an interim in which a change has been declared. If payments are made through a state or local entity, the LHC will request a record of payments for the past 12 months.

Third-party verification from the person paying the support

If the family declares that it ***receives irregular or no payments***, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts

If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

### **Proposed Change**

#### **LHC Standard Operating Procedure**

The LHC will require verification for alimony and child support at admission, and during each annual re-examination, or an interim in which a change has been declared. If payments are made through a state or local entity, the LHC will request a record of payments for the past 12 months.

Notarized statement of support from the payor.

If the family declares that it ***receives irregular or no payments***, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts

If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

The LHC will count all lump-sum payments for a twelve-month period, and re-average child support and alimony should payments stop for 90 days, at client's request.

The family declares that it ***receives irregular or no payments***, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts

If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

The LHC will count all lump-sum payments for a twelve-month period, and re-average child support and alimony should payments stop for 90 days, at client's request.

## Chapter 8

### Current Plan

#### **Clarifications of HUD Requirements**

#### **LHC Standard Operating Procedure (page 8-4)**

##### **Doors**

All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.

All interior doors must have no holes, have all trim intact, and be openable without the use of a key.

##### **Proposed Change**

All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.

All interior doors must have no holes, have all trim intact.

#### **Owner and Family Inspection Attendance (page 8-8)**

##### **LHC Standard Operating Procedure**

When a family occupies the unit at the time of inspection an adult must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

If reasonable notice has been given, and the family and/or owner fails to comply with the inspection request, the unit will automatically fail, and a re-inspection will be scheduled. If the second request is a no show as well, the participant will receive a termination.

If an LHC inspector goes to an inspection and finds the items are not repaired which were indicated on a previous inspection, a \$50.00 charge will be deducted from the Landlord's next Housing Assistance Payment Check. This lack of housing assistance cannot be charged back to the tenant. All hardwire smoke detectors must have battery backup.

At initial inspection of a vacant unit, the LHC will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted but is not required.

#### LHC Standard Operating Policy

When a family occupies the unit at the time of inspection an adult must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

If reasonable notice has been given, and the family and/or owner fails to comply with the inspection request, the unit will automatically fail, and a re-inspection will be scheduled. If the second request is a no show as well, the participant will receive a termination. This lack of housing assistance cannot be charged back to the tenant. All hardwire smoke detectors must have battery backup.

At initial inspection of a vacant unit, the LHC will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted but is not required.

#### **8-II.C. ANNUAL HQS INSPECTIONS [24 CFR 982.405(a)] (page 8-10)**

##### **Scheduling the Inspection**

Each unit under HAP contract must have an annual inspection no more than 12 months after the most recent inspection.

#### LHC Standard Operating Procedure

If an adult family member cannot be present on the scheduled date, the family should request that the LHC reschedule the inspection. The LHC and family will agree on a new inspection date that generally should take place within 5 business days of the originally-scheduled date. The LHC may schedule inspection more than 5 business days after the original date for good cause.

If the family misses the first scheduled appointment without requesting a new inspection date, the LHC will automatically schedule a second inspection. If the family misses two scheduled inspections without LHC approval, the LHC will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

Each unit under HAP contract must have an annual inspection no more than 24 months after the most recent inspection

Proposed Change

#### LHC Standard Operating Procedure

If an adult family member cannot be present on the scheduled date, the family should request that the LHC reschedule the inspection. The LHC and family will agree on a new inspection date that generally should take place within 10 business days of the originally-scheduled date.

If the family misses the first scheduled appointment without requesting a new inspection date, the LHC will automatically schedule a second inspection. If the family misses two scheduled inspections without LHC approval, the LHC will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

## Chapter 9

### **B. REQUESTING TENANCY APPROVAL [Form HUD-52517].**

#### **Current Plan**

##### **LHC Standard Operating Procedure**

The RFTA must be signed by both the family and the owner. The owner may submit the RFTA on behalf of the family.

Completed RFTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, or by mail.

The family may not submit, and the LHC will not process, more than one (1) RFTA at a time.

When the family submits the RFTA the LHC will review the RFTA for completeness.

If the RFTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RFTA, the LHC will notify the family and the owner of the deficiencies.

Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, or by fax. The LHC will not accept missing information over the phone.

When the family submits the RFTA and proposed lease, the LHC will also review the terms of the RFTA for consistency with the terms of the proposed lease.

If the terms of the RFTA are not consistent with the terms of the proposed lease, the LHC will notify the family and the owner of the discrepancies.

Because of the time sensitive nature of the tenancy approval process, the LHC will attempt to communicate with the owner and family by phone. The LHC will use mail only when the parties can't be reached by phone, or email.

#### **Proposed Change**

##### **LHC Standard Operating Policy**

The RFTA must be signed by both the family and the owner. The owner may submit the RFTA on behalf of the family.

Completed RFTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, or by mail.

The family may not submit, and the LHC will not process, more than one (1) RFTA at a time.

When the family submits the RFTA the LHC will review the RFTA for completeness.

If the RFTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RFTA, the LHC will notify the family and the owner of the deficiencies.

Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, email, or by fax. The LHC will not accept missing information over the phone.

When the family submits the RFTA and proposed lease, the LHC will also review the terms of the RFTA for consistency with the terms of the proposed lease.

If the terms of the RFTA are not consistent with the terms of the proposed lease, the LHC will notify the family and the owner of the discrepancies.

Corrections to the terms of the RFTA and/or the proposed lease will only be accepted as hard copies, in-person, or by mail. The LHC will not accept corrections by phone.

Because of the time sensitive nature of the tenancy approval process, the LHC will attempt to communicate with the owner and family by phone, email. The LHC will use mail only when the parties can't be reached by phone, or email.

#### **9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305] (Page 9-10)**

##### **Current Plan**

###### **LHC Standard Operating Procedure**

The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the LHC. The owner and the LHC will execute the HAP contract. The LHC will not execute the HAP contract until the owner has submitted IRS form W-9, the direct deposit form, and the owner's email address. The LHC will ensure that the owner receives a copy of the executed HAP contract.

##### **Proposed Change**

##### **Current Plan**

###### **LHC Standard Operating Policy**

The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the LHC. The LHC will ensure that both the owner and the assisted family receive copies of the dwelling lease. The owner and the LHC will execute the HAP contract. The LHC will not execute the HAP contract until the owner has submitted IRS form W-9, the direct deposit form, and the owner's email address. The LHC will ensure that the owner receives a copy of the executed HAP contract.

#### **Chapter 10**

##### **Current Plan**

##### **Sending Documentation to the Receiving PHA (page 10-12)**

In addition to these documents, the LHC will provide the following information, if available, to the receiving PHA:

Social security numbers (SSNs)

Documentation of SSNs for all family members age 6 and over

Documentation of legal identity

Documentation of citizenship or eligible immigration status

Documentation of participation in the earned income disallowance (EID) benefit

Documentation of participation in a family self-sufficiency (FSS) program A

copy of the family's current EIV data

The LHC will notify the family in writing regarding any information provided to the receiving PHA [HCV GB, p. 13-3].

## Proposed Change

### **Sending Documentation to the Receiving PHA (page 10-12)**

In addition to these documents, the LHC will provide the following information, if available, to the receiving PHA:

Documentation of participation in the earned income disallowance (EID) benefit

Documentation of participation in a family self-sufficiency (FSS) program A

copy of the family's current EIV data

The LHC will notify the family in writing regarding any information provided to the receiving PHA [HCV GB, p. 13-3].

## Chapter 11

### **Page 11-2**

#### **Current Plan**

#### LHC Standard Operating Procedure

The LHC will begin the annual reexamination process 120 days in advance of its scheduled effective date. Generally, the LHC will schedule annual reexamination effective dates to coincide with the family's anniversary date.

*Anniversary date* is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family moves to a new unit, the LHC will perform a new annual reexamination.

The LHC also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

### **11-I.B. SCHEDULING ANNUAL REEXAMINATIONS**

#### **Proposed Change**

#### LHC Standard Operating Procedure

The LHC will begin the annual reexamination process no more than 120 days in advance of its scheduled effective date. Generally, the LHC will schedule annual reexamination effective dates to coincide with the family's anniversary date.

*Anniversary date* is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family moves to a new unit, the LHC will perform a new annual reexamination.

The LHC also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

## **Page 11-6**

### **New Family and Household Members Requiring Approval**

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request PHA approval to add a new family member [24 CFR 982.551(h)(2)] or another household member (live-in aide, Spouse, disabled/elderly household member, or foster child) [24 CFR 982.551(h)(4)].

## **Page 11-7**

### **Current Plan**

Families must request LHC approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days, or 90 cumulative days, within a twelve-month period, and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the LHC prior to the individual moving in the unit.

### LHC Standard Operating Procedure

If a household member ceases to reside in the unit, the family must inform the LHC within business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent.

### **Proposed Change**

### LHC Standard Operating Procedure

Families must request LHC approval to add a new family member, live-in aide, Spouse, Disabled/elderly household member, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days, or 90 cumulative days, within a twelve-month period, and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the LHC prior to the individual moving in the unit.

## **Page 11-8**

### **Current Plan**

The family must provide the LHC a copy of the revised lease identifying the family member who was removed,

In addition, the family must provide a: driver's license showing their new address, and/or current mail being received at that address.

If ceases to reside in the unit, the family must inform the PHA within 30 business days.

### **Proposed Change**

The family must provide the LHC a copy of the revised lease identifying the family member who was removed, or a notarized statement from the person whom they are residing with.



In addition, the remove: new family member family must provide a Remove: driver's license State issued picture ID showing their new address, and/or current mail being received at that address.

If a live-in aide, Remove: foster child, or foster adult change to: or any member of the household ceases to reside in the unit, the family must inform the PHA within 10 Change to 30 business days.

Method of Reporting Page 11-12  
Current Plan

Method of Reporting

#### LHC Standard Operating Procedure

The family may notify the LHC of changes r in writing. Generally, the family will not be required to attend an interview for an interim reexamination. However, if

the LHC determines that an interview is warranted, the family may be required to attend.

Based on the type of change reported, the LHC will determine the documentation the family will be required to submit. The family must submit any required information or documents within 10 business days of receiving a request from the LHC. This time frame may be extended for good cause with LHC approval. The LHC will accept required documentation by mail, by e-mail pdf, by fax, or in person.

#### Proposed Change

#### LHC Standard Operating Procedure

The family may notify the LHC of changes in writing. Generally, the family will not be required to attend an interview for an interim reexamination. However, if

the LHC determines that an interview is warranted, the family may be required to attend.

Based on the type of change reported, the LHC will determine the documentation the family will be required to submit. The family must submit any required information or documents within 5 business days of receiving a request from the LHC. This time frame may be extended for good cause with LHC approval. The LHC will accept required documentation by mail, by e-mail pdf, by fax, or in person.

#### Page 11-12 Current Plan

##### Standard Operating Procedure:

If the family share of the rent is to *decrease*:

Changes documented on the Income and Asset and Personals Declaration forms available at the LHC reception window. In order to qualify for a rent reduction for the following month, clients must report income decreases by the 15<sup>th</sup> of the month proceeding change the effective month of the reduction to for LHC to verify the income.

Effective with this Administrative Plan LHC will only conduct an interim income review for decreases once a year unless there is at a 50% decrease of annual income.

##### Proposed Change

##### Standard Operating Policy:

If the family share of the rent is to *decrease*:

Changes documented on the HCV Certification forms available at the LHC reception window remove and replace with office. In order to qualify for a rent reduction for the following month, clients must report income decreases by the 15<sup>th</sup> of the month proceeding change the effective month of the reduction to for LHC to verify the income.

#### Chapter 13 Page 13-15

##### Current Plan

##### LHC Standard Operating Procedure

Assignment of the HAP contract will be approved only if the new owner is qualified to become an owner under the HCV program according to the policies in Section 13-I.D. of this chapter.

The LHC must receive a signed, written request from the existing owner stating the name and address of the new HAP payee and the effective date of the assignment in order to change the HAP payee under an outstanding HAP contract.

Within 10 business days of receiving the owner's request, the LHC will inform the current owner in writing whether the assignment may take place.

The new owner must provide a written certification to the LHC that includes:

A copy of the escrow statement or other document showing the transfer of title and recorded deed;

A copy of the owner's IRS Form W-9, Request for Taxpayer Identification Number and Certification, or the social security number of the new owner;

The effective date of the HAP contract assignment;

A written agreement to comply with the terms of the HAP contract; and

Confirmation the new owner is not a prohibited relative.

If the new owner does not agree to an assignment of the HAP contract, or fails to provide the necessary documents, the LHC will terminate the HAP contract with the old owner. If the new owner wants to offer the family a new lease, and the family elects to stay with continued assistance, the LHC will process the leasing in accordance with the policies in chapter 9.

## Proposed Change

### LHC Standard Operating Policy

Assignment of the HAP contract will be approved only if the new owner is qualified to become an owner under the HCV program according to the policies in Section 13-I.D. of this chapter.

The LHC must receive a signed, written request from the existing owner stating the name and address of the new HAP payee and the effective date of the assignment in order to change the HAP payee under an outstanding HAP contract.

Within 10 business days of receiving the owner's request, the LHC will inform the current owner in writing whether the assignment may take place.

The new owner must provide a written certification to the LHC that includes:

A copy of the escrow statement or other document showing the transfer of title and recorded deed;

A copy of the owner's IRS Form W-9, Request for Taxpayer Identification Number and Certification, or the social security number of the new owner;

A completed Direct Deposit setup form

The effective date of the HAP contract assignment;

A written agreement to comply with the terms of the HAP contract; and

Confirmation the new owner is not a prohibited relative.

If the new owner does not agree to an assignment of the HAP contract, or fails to provide the necessary documents, the LHC will terminate the HAP contract

Chapter 13-II. G Page 13-16

## Current Plan

### LHC Standard Operating procedure

The LHC will provide all HCV applicants that have been issued a voucher with information regarding the PTFA at admission (see Section 5-I. B) and to participant heads of household at annual reexamination.

The PHA will provide information regarding the PTFA to prospective owners when they begin their participation in the HCV program, and to current HCV owners one time with the monthly HAP.

Note that the foreclosure provision of the HAP contract and additional tenant protections under the Protecting Tenants at Foreclosure Act will sunset December 31, 2014.

See Section 12-III.B for a discussion of foreclosure as it pertains to owner termination of tenancy

Proposed Change

#### LHC Standard Operating procedure

The LHC will provide all HCV applicants that have been issued a voucher with information regarding the PTFA at admission (see Section 5-I. B) and to participant heads of household at annual reexamination.

The PHA will provide information regarding the PTFA to prospective owners when they begin their participation in the HCV program, and to current HCV owners one time with the monthly HAP.

# **LIPH 2018 ACOP Suggested Changes**

**Chapter 1: Overview of Program and Plan - No suggested changes**

**Chapter 2: Fair Housing and Equal Opportunity – no suggested changes**

**Chapter 3: Eligibility**

**Current: 3-III.D. SCREENING pg. 3-21**

LHC is required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a State of Michigan sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 960.204(a)(4)].

**Proposed: 3-III.D. SCREENING pg. 3-21**

## **LHC Policy**

LHC will use the Dru Sjodin National Sex Offender database to screen applicants for admission.

Additionally, LHC must ask whether the applicant, or any member of the applicant's household, is subject to a lifetime registered sex offender registration requirement in any state [Notice PIH 2012-28].

**Current: 3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING pg. 3-27**

The Violence against Women Act of 2005 (VAWA) and the HUD regulation at 24 CFR 5.2005(b) prohibit LHC's from denying admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking.

**Current Notification Policy:**

## **LHC Policy**

LHC acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record) that would warrant denial under LHC's policies.

**Proposed: 3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING pg. 3-27**

The Violence against Women Act of 2013 (VAWA) and the HUD regulation at 24 CFR 5.2005(b) prohibit PHAs from denying admission to an otherwise qualified applicant on the basis or as a direct result of the fact that the applicant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

### **Adding this section in Notification:**

VAWA 2013 expanded notification requirements to include the obligation for PHAs to provide applicants who are denied assistance with a VAWA Notice of Occupancy Rights (form HUD-5380) and a domestic violence certification form (HUD-5382) at the time the applicant is denied.

#### **Proposed Notification Policy:**

LHC acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, poor rental history, a record of previous damage to an apartment, a prior arrest record) due to adverse factors that would warrant denial under LHC's policies.

While LHC is not required to identify whether adverse factors that resulted in the applicant's denial are a result of domestic violence, dating violence, sexual assault, or stalking, the applicant may inform LHC that their status as a victim is directly related to the grounds for the denial. LHC will request that the applicant provide enough information to LHC to allow LHC to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim.

LHC will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, and a copy of the form HUD-5382. LHC will request in writing that an applicant wishing to claim this protection notify LHC within 14 business days.

### **Chapter 4: Applications, Waiting List and Tenant Selection - No suggested changes**

### **Chapter 5: Occupancy Standards and Unit Offers**

#### **Current: 5-I.B. DETERMINING UNIT SIZE pg. 5-2**

- Foster children may be included in determining unit size.
- **Added:** The family may add foster children to the household as long as it does not overcrowd the home, will be considered when determining unit size.
- **Added:** Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.

### **Chapter 6: Income and Rent Determinations - no suggested changes**

## **Chapter 7: Verification**

### **Current: 7-I.C UP-FRONT INCOME VERIFICATION (UIV) EIV pg. 7-6**

Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify and calculate earned income, unemployment benefits, Social Security and/or SSI benefits.

Proposed:

Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

## **Chapter 8: Leasing and Inspections**

### **Current: 8-I.A. OVERVIEW pg. 8-1**

The term of the lease is for a period of 12 months. The lease will be renewed automatically for another 12-month term, except that LHC may not renew the lease if the family has violated the community service requirement [24 CFR 966.4(a)(2)].

Proposed:

The term of the lease is for a period of month to month with a 30-day written notice to vacate given. The lease will be renewed automatically for another month to month term with a 30-day written notice to vacate, except that LHC may not renew the lease if the family has violated the community service requirement [24 CFR 966.4(a)(2)].

### **Current: Orientation Agenda pg. 8-2**

Added:

The LHC lease

A copy of the form HUD-5380, VAWA Notice of Occupancy Rights

A copy of the form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking

A copy of LHC's smoke -free policy

A notice that includes the procedures for requesting relief and LHC's criteria for granting request for relief for excess utility surcharges

### **Current: 8-I.F. PAYMENTS UNDER THE LEASE Rent Payments [24 CFR 966.4(b)(1)] pg. 8-5**

The resident rent is due and payable at the LHC-designated location on the first of every month. If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter.



**Proposed:**

The resident rent is due and payable at the LHC-designated location on the first of every month.

**Add: Excess Utility Charges pg. 8-7**

LHC may grant requests for relief from surcharges from excess utility consumption of PHA-furnished utilities as a reasonable accommodation where LHC deems an exception is appropriate to meet the needs of elderly, ill, or disabled residents. In determining whether to grant this request, LHC will consider special factors affecting utility usage that are not within the control of the resident, such as the need for medical equipment. Residents may request relief in accordance with Section 2-II.C. of this ACOP. LHC will process such requests in accordance with Section 2-II.E. of this ACOP.

Notice of the availability of procedures for requesting relief (including LHC representative with whom initial contact may be made by the resident) and LHC's criteria for granting requests, will be included in each notice to residents of changes in utility allowances or surcharges as well as to new residents as part of the lease orientation.

**Chapter 9: Recertifications -No suggested changes****Chapter 10: Pet Policy -No suggested changes****Chapter 11: Community Service****Definitions*****Exempt Individual [24 CFR 960.601(b), Notice PIH 2015-12] pg. 11-2***

Added: the supplemental nutrition assistance program (SNAP) and has not been found by the state or other administering entity to be in noncompliance with such program.

**Chapter 12: Transfer Policy****12-I.B. EMERGENCY TRANSFERS pg. 12-1**

Added: The VAWA 2013 final rule requires LHC to adopt an emergency transfer plan for victims of domestic violence, dating violence, sexual assault, or stalking.

Added: A verified incident of domestic violence, dating violence, sexual assault, or stalking. For instances of domestic violence, dating violence, sexual assault, or stalking, the threat may be established through documentation outlined in section 16-VII.D. In order to request the emergency transfer, the requestor must submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP), although, LHC may waive this requirement in order to expedite the transfer process.

**Potential add:**

LHC will immediately process requests for transfers due to domestic violence, dating violence, sexual assault, or stalking. LHC will allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available. LHC

defines *immediately available* as a vacant unit, that is ready for move-in within a reasonable period of time, not to exceed **[insert number of days]**. If an internal transfer to a safe unit is not immediately available, LHC will assist the resident in seeking an external emergency transfer either within or outside LHC's programs.

LHC has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan.

#### Potential add

If the emergency transfer is necessary to protect a victim of domestic violence, dating violence, sexual assault, or stalking, LHC will follow procedures outlined in Exhibit 16-4.

### **12-III.C. ELIGIBILITY FOR TRANSFER pg. 12-8**

#### Current

LHC will not transfer a resident from one unit to another unless it is an approved reasonable accommodation or to correct over or under-housed residents.

A resident with housekeeping standards violations will not be transferred until the resident passes a follow-up housekeeping inspection.

Exceptions to the good record requirement may be made when it is to LHC determines a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, or stalking and who provides documentation of abuse in accordance with section 16-VII.D of this ACOP.

#### Proposed:

Except where reasonable accommodation is being requested, LHC will only consider transfer requests from residents that meet the following requirements:

- Have not engaged in criminal activity that threatens the health and safety of residents and staff

- Owe no back rent or other charges, or have a pattern of late payment

- Have no housekeeping lease violations or history of damaging property

- Can get utilities turned on in the name of the head of household (applicable only to properties with tenant-paid utilities)

A resident with housekeeping standards violations will not be transferred until the resident passes a follow-up housekeeping inspection.

Exceptions to the good record requirement may be made when it is to LHC's advantage to make the transfer.

Exceptions will also be made when LHC determines that a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking, and who provides documentation of abuse in accordance with section 16-VII.D of this ACOP. Tenants who are not in good standing may still request an emergency transfer under VAWA.

If a family requested to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines, the family will not be eligible to transfer to a larger size unit for a period of two years from the date of admission, unless they have a change in family size or composition, or it is needed as a reasonable accommodation.

#### **12-III.F. HANDLING OF REQUESTS pg. 12-9**

##### **Adding**

In order to request the emergency transfer under VAWA, the resident will be required to submit an emergency transfer request form (HUD-5383) (Exhibit 16-4 of this ACOP). LHC may, on a case-by-case basis, waive this requirement and accept a verbal request in order to expedite the transfer process. If LHC accepts an individual's statement, LHC will document acceptance of the statement in the individual's file in accordance with 16-VII.D. of this ACOP. Transfer requests under VAWA will be processed in accordance with LHC's Emergency Transfer Plan (Exhibit 16-3). In case of a reasonable accommodation transfer, LHC will encourage the resident to make the request in writing using a reasonable accommodation request form. However, LHC will consider the transfer request any time the resident indicates that an accommodation is needed whether or not a formal written request is submitted.

#### **Chapter 13: Terminations**

##### **Current: 13-III.F. TERMINATIONS RELATED TO DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING Limits on VAWA Protections [24 CFR 5.2005(d) and (e), FR Notice 8/6/13]] pg. 13-15**

including but not limited to transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat" [24 CFR 5.2005(d)(3)]. Additionally, HUD regulations state that restrictions "predicated on public safety cannot be based on stereotypes but must be tailored to particularized concerns about individual residents" [24 CFR 5.2005(d)(3)].

Added: While VAWA prohibits a PHA from using domestic violence, dating violence, sexual assault, or stalking as the cause for a termination or eviction action against a public housing tenant who is the victim of the abuse, the protections it provides are not absolute. Specifically:

- VAWA does not limit a PHA's otherwise available authority to terminate assistance to or evict a victim for lease violations not premised on an act of domestic violence, dating violence, sexual assault, or stalking providing that the PHA does not subject the victim to a more demanding standard than the standard to which it holds other tenants.

- VAWA does not limit a PHA's authority to terminate the tenancy of any public housing tenant if the PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant's tenancy is not terminated.

HUD regulations define *actual and imminent threat* to mean words, gestures, actions, or other indicators of a physical threat that (a) is real, (b) would occur within an immediate time frame, and (c) could result in death or serious bodily harm [24 CFR 5.2005(d)(2) and (e)]. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:

- The duration of the risk
- The nature and severity of the potential harm
- The likelihood that the potential harm will occur
- The length of time before the potential harm would occur [24 CFR 5.2005(e)]

In order to demonstrate an actual and imminent threat, the PHA must have objective evidence of words, gestures, actions, or other indicators. Even when a victim poses an actual and imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat, including but not limited to transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat" [24 CFR 5.2005(d)(3)]. Additionally, HUD regulations state that restrictions "predicated on public safety cannot be based on stereotypes but must be tailored to particularized concerns about individual residents" [24 CFR 5.2005(d)(3)].

### LHC Policy

In determining whether a public housing tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, LHC will consider the following, and any other relevant, factors:

Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault, or stalking

Whether the threat is a physical danger beyond a speculative threat

Whether the threat is likely to happen within an immediate time frame

Whether the threat to other tenants or employees can be eliminated in some other way, such as by helping the victim relocate to a confidential location, transferring the victim to another unit, or seeking a legal remedy to prevent the perpetrator from acting on the threat

If the tenant wishes to contest LHC's determination that he or she is an actual and imminent threat to other tenants or employees, the tenant may do so as part of the grievance hearing or in a court proceeding.

### **Terminating or Evicting a Perpetrator of Domestic Violence pg. 13-18**

**Added:** The PHA must not initiate eviction procedures until 30 days after the lease bifurcation [Notice PIH 2017-08].

## **Chapter 14: Grievance Policy**

Added: good cause for missed appointment to be rescheduled

## **Chapter 15: Program Integrity**

Current: **PART I: PREVENTING, DETECTING, AND INVESTIGATING ERRORS AND PROGRAM ABUSE pg. 15-1**

### **15-I.A. PREVENTING ERRORS AND PROGRAM ABUSE**

Resident Counseling. LHC will routinely provide Resident counseling as a part of every re-certification interview in order to clarify any confusion pertaining to program rules and requirements.

Proposed change:

Resident Counseling. LHC will provide the opportunity for Resident counseling on rules and regulations as a part of every re-certification interview if requested by the resident

## **Chapter 16: Program Administration**

### **PART V: RECORD KEEPING 16-V.B. RECORD RETENTION Pg. 16-13**

**Added:** Notice PIH 2014-20 requires the PHA to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.

The PHA must keep confidential records of all emergency transfer requested under the PHA's Emergency Transfer Plan, and the outcomes of such requests, and retain the records for a period of three years, or for a period as specific in program regulations [24 CFR 5.2002(e) (12)].

### **PART VII: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY 16-VII.B. DEFINITIONS [24 CFR 5.2003] Pg. 16-19**

**Added:** The term *affiliated individual* means, with respect to a person:

- A spouse, parent, brother or sister, or child of that individual, or an individual to whom that person stands in the position or place of a parent; or
- Any individual, tenant or lawful occupant living in the household of the victim of domestic violence, dating violence, sexual assault, or stalking.

**Added:** The term *sexual assault* means:

- o Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent

## **Notification to Applicants and Tenants [24 CFR 5.2005(a)(1)] pg. 16-21**

Added: The PHA must distribute a notice of VAWA rights, along with the VAWA self-certification form (HUD-5382) at each of these three junctures.

Add: or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

## **Conflicting Documentation [24 CFR 5.2007(e)] pg. 16-24**

The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA

Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08].

## **LHC policy**

If presented with conflicting certification documents (two or more forms HUD-50066) from members of the same household, the LHC will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(b)(2) or (3) and by following any HUD guidance on how such determinations should be made.

## **Change**

If presented with conflicting certification documents from members of the same household, LHC will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made. When requesting third-party documents, LHC will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.

If LHC does not receive third-party documentation within the required timeframe (and any extensions) LHC will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, LHC will hold separate hearings for the applicants or tenants.



COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Resolution No. 1290**

Adopted by the Lansing Housing Commission

March 29, 2018

**BE IT RESOLVED BY THE LANSING HOUSING COMMISSION:**

**Approval of the 2018 Annual Plan**

**BE IT RESOLVED BY THE LANSING HOUSING COMMISSION:**

Martell V. Armstrong acting in his capacity as Executive Director, or his designee, is authorized to submit the Lansing Housing Commission's 2018 Annual Plan to the U. S. Department of Housing and Urban Development. In addition, the Commission approves the 2018 Annual Plan including Admissions and Continue Occupancy and Administrative Plan changes as presented.

  
Chair

Yeas 3

Nays 0

Abstentions 0

Attest   
Secretary

For Clerks Use Only

Resolution No: 1290  
Date Adopted: 03/29/2018



# Certification of Compliance with PHA Plans and Related Regulations (Small PHAs)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 02/29/2016

## PHA Certifications of Compliance with the PHA Plans and Related Regulations including Civil Rights and PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the \_\_\_ 5-Year and/or \_\_\_ Annual PHA Plan for the PHA fiscal year beginning **July 1, 2018**, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last Annual PHA Plan (check all policies, programs, and components that have been changed):
  - \_\_\_ 903.7a Housing Needs
  - \_\_\_ 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
  - \_\_\_ 903.7c Financial Resources
  - \_\_\_ 903.7d Rent Determination Policies
  - \_\_\_ 903.7h Demolition and Disposition
  - \_\_\_ 903.7k Homeownership Programs
  - \_\_\_ 903.7r Additional Information
    - \_\_\_ A. Progress in meeting 5-year mission and goals
    - \_\_\_ B. Criteria for substantial deviation and significant amendments
    - \_\_\_ C. Other information requested by HUD
      - \_\_\_ 1. Resident Advisory Board consultation process
      - \_\_\_ 2. Membership of Resident Advisory Board
      - \_\_\_ 3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
  6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
  7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
  8. For a PHA Plan that includes a policy for site based waiting lists:
    - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);



- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
  17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
  19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  21. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).


Lansing Housing Commission  
PHA Name

MI-058  
PHA Number/HA Code

\_\_\_\_ 5-Year PHA Plan for Fiscal Years 20\_\_\_\_ - 20\_\_\_\_

Annual PHA Plan for Fiscal Year 2018-2019\_\_\_\_

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Tony Baltimore	Board Chairperson
Signature	Date
	3-29-18



COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**LHC Annual Plan Meeting  
Sign-In Sheet  
Date of Meeting: March 29, 2018**

Name	Organization	Phone #	E-mail
ANDREA BAILEY	LIPH	517.372.7145	ANDREA.B@LANSHC.ORG
Marshall Brice	LIPH	517-862-0847	marshallb@lanshc.org
Marvin Ellis	LIPH	517-230-1322	marvine@lanshc.org
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Marcus Hardy	LIPH	517-862-0855	Marcush@lanshc.org
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