



Lansing Housing Commission (LHC)

Annual Plan Changes

April 2022

1

Proposed changes related to Public Housing plan

Public Housing: Chapter 3

<u>Change</u>	<u>Details</u>
Chapter 3 Family and Household	Updated <ul style="list-style-type: none">• Included “<i>automatically</i>” for “<i>LHC will not automatically assign a larger bedroom size due to additions of family members other than by marriage, birth, adoption or court awarded custody.</i>”
Chapter 3 Dependent	Updated <ul style="list-style-type: none">• Changed 50 percent to “<i>51 percent</i>” for “<i>Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 51 percent or more of the time.</i>”
Chapter 3 Guests	Updated <ul style="list-style-type: none">• Changed guest notification durations to “<i>A resident family must notify LHC when overnight guests will be staying in the unit for more than 14 consecutive days. A guest can remain in the unit no longer than a total of 30 cumulative calendar days during any 12-month period.</i>”
Chapter 3 EIV System Searches	Added <ul style="list-style-type: none">• Included new section to address details for EIV existing tenant searches. The section includes policies and information about searches, debts owed and terminations, and income and IVT reports.

Public Housing: Chapter 6

Change

Details

Chapter 6

Permissive
Deductions

Updated

- Changed a reference from Detroit to Lansing.

Public Housing: Chapter 8

Change

Details

Chapter 8

Payments Under
Lease

Updated

- Increased notification times and timing for vacating to “If the family fails to pay their rent by the 1st day of the month, and the LHC has not agreed to accept payment at a later date, a 30-day Notice to Vacate will be issued to the resident on the 5th day of the month for failure to pay rent, demanding payment in full or the surrender of the premises.”

Public Housing: Chapter 9

Change

Details

Chapter 9

Changes Affecting Income or Expenses

Updated

- The amount of income change triggering a rent change has been increased from \$1,000 to \$2,400 for *“Interim changes in rent will be calculated only if income goes up or down \$2,400.00 annually or in any amount if the change income will last for a full 30 days Changes must be documented on the PH certification form forms. In order to qualify for a rent reduction for the following month, clients must report income decreases by the 15th day of the month proceeding the effective month of the reduction to allow LHC to verify the income. Should a participant report an income change that does not meet the reporting guidelines set forth in the LHC Administrative plan (i.e. less than \$2,400.00 annually, or in any amount if the change income will last for a full 30 days) the change will not be processed and a letter will be sent to the participant indicating no change was made. A family who fails to abide by LHC’s interim reporting requirements may be terminated from the Public Housing Program.”*

Public Housing: Chapter 10

Change

Details

Chapter 10

Standard for Pets

Updated

- Changed a reference from Detroit to Lansing.

Public Housing: Dwelling Lease

Change

Details

Dwelling Lease

Updated

- Changed written notice of the proposed lease termination for failure to pay rent from 14 days to 30 days.

2

Proposed changes related to Housing Choice Voucher plan

Housing Choice Voucher: Chapter 4

Change

Details

Chapter 4

Added

Reporting Changes in Family Circumstances While on Waiting List

- *“No later than 10 business days from the date of change”* to inform LHC of change.
- *“Completed by the family through the applicant portal www.waitlistcheck.com”* as method to report change.

Chapter 4

Updated

Purging the Waiting List

- The purging process was updated to the following: *“LHC reserves the right to purge the waiting list by removing (deleting) all applications that were not selected during the 12-month period that began on the date the waiting list was closed.”*

Chapter 4

Added

Targeted Funding

- *“Emergency Housing Vouchers”* to the LHC’s list of target funds administered.

Housing Choice Voucher: Chapter 4

Change

Details

Chapter 4

Residency
Preference

Added

- *“Working or notified that they are hired to work in a residency area”* for qualification of the residency preference.
- The following language was added to the section:
- *Local preferences must be verified at the time the applicant is selected from the waiting list. Failure to provide documentation to verify a local preference existed at the time of application will result in denial of assistance. The applicant may reapply to the waiting list when the waiting list is open again.*
- *Following is a list of documents that can be provided to verify a local preference:*
 - *Proof that that the head of household, spouse, or co-head currently lives in the local jurisdiction residency was claimed:*
 - *A copy of a valid driver’s license which includes a current address*
 - *A copy of a valid state ID card which includes a current address*
 - *A copy of a valid Medicaid card which includes a current address*
 - *A valid Social Security printout letter which includes a current address*
 - *A copy of a valid voter’s registration card which includes a current address*
 - *A letter from the Homeless Shelter, HARA, or Lead Agency indicating residency Proof that the head of household, spouse, or co-head currently works in the local jurisdiction local residency was claimed:*
 - *A letter from the employer stating the applicant is employed in the local jurisdiction.*
 - *A copy of a valid paycheck stub with the employer’s address showing business is located in jurisdiction.*

Chapter 4

Order Selection

Added

- *“Based on local preferences”* as methodology option of selection.

Housing Choice Voucher: Chapter 5

<u>Change</u>	<u>Details</u>
Chapter 5 Briefing	Added <ul style="list-style-type: none">• Individual face to face meetings and remote meetings as options for briefing sessions.• Details, requirements, expectations, and operating procedures for the different types of meetings.
Chapter 5 Additional Items to be Included in Briefing Packet	Added <ul style="list-style-type: none">• Following items have been added to be included in the briefing packet:<ul style="list-style-type: none">○ <i>Protect Your Family from Lead in Your Home</i>○ <i>Is Fraud Worth It</i>○ <i>Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking (HUD-5382) and the Notice to Applicants and Tenants Regarding the Violence Against Women Act (MSHDA 1631)</i>○ <i>Family Self Sufficiency/HCV Advantage Program</i> Updated <ul style="list-style-type: none">• Website for vacancy listings.
Chapter 5 Timeframes for Reporting Changes Required by Family Obligations	Updated <ul style="list-style-type: none">• 30 business days to 30 days.

Housing Choice Voucher: Chapter 5

Change

Details

Chapter 5

Family
Obligations

Added

- Individual face to face meetings and remote meetings as options for briefing sessions.
- Details, requirements, expectations, and operating procedures for the different types of meetings.
- *“The family must supply all information to LHC as it relates to family income and composition for each scheduled reexamination and interim reexamination. This includes reporting all cash contributions/financial assistance received on an ongoing basis from person(s) not living in the household or from any organization to assist with rent payments, utility payments, car payments, phone payments, etc.”*

Removed

- *“The family must supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.”*

Housing Choice Voucher: Chapter 6

Change

Details

Chapter 6

Calculation of the Disallowance

Removed

- *“The 12 months are cumulative and need not be consecutive”* for initial 12-month exclusion and second 12-month exclusion and phase-in.

Updated

- The eligibility period from four year to two year to align with rest of section.

Chapter 6

Imputing Income from Assets

Added

- *Note: The HUD field office no longer provides an interest rate for imputed asset income. The “safe harbor” is now for the PHA to establish a passbook rate within 0.75 percent of a national average.*
- *The PHA must review its passbook rate annually to ensure that it remains within 0.75 percent of the national average.*

LHC Standard Operating Procedure

- *LHC initially sets the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).*
- *LHC will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.*
- *The effective date of changes to the passbook rate will be determined at the time of review. The passbook interest rate for LHC is 0.09%.*

Housing Choice Voucher: Chapter 7

Change

Details

Chapter 7

Documentation
of Age

Added

- Items accepted to document age:
 - 1. *Birth Certificate*
 - 2. *Driver's license or State Identification Card (current or expired)*
 - 3. *Hospital Record*
 - 4. *Affidavit of Parentage*
 - 5. *Form DD-214 (Veterans Only)*
 - 6. *United States Passport*
 - 7. *Cradle Roll*
 - 8. *Baptism Record*
 - 9. *Naturalization Certificate*
 - 10. *Letter from unit of local government (of birth location) identifying why a birth certificate is not available*
 - 11. *Third-Party Verification of birth (i.e. letter from Social Security Administration [SSA])*
 - 12. *Resident alien card*

Chapter 7

Documentation
of Disability

Updated

- Website reference now: "<http://www.hhs.gov/ocr/privacy>"

Housing Choice Voucher: Chapter 8

Change

Details

Chapter 8

Thermal Environment

Updated

- Interior heating temperature requirement was changed from 65 to 68 for the time period of October 1 through May 1.

Chapter 8

Life Threatening Conditions

Updated

- Changed absence of heating system when outside temperature is below 60 to *“Absence of a heating system that can maintain a temperature of 68 degrees, when outside temperature is below 60 degrees Fahrenheit.”*

Added

- *Conditions that present the imminent possibility of injury.*
- *Obstacles that prevent safe entrance or exit from the unit.*
- *Any components that affect the function of the fire escape are missing or damaged.*
- *Stored items or other barriers restrict or prevent the use of the fire escape in the event of an emergency.*
- *The building’s emergency exit is blocked or impeded, thus limiting the ability of occupants to exit in a fire or other emergency.*
- *Open sewage in the unit.*

Housing Choice Voucher: Chapter 8

Change

Details

Chapter 8

Life Threatening
Conditions

Added

- *Severely broken windowpanes that are within the reach of family members • Gas/ oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting.*
- *The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases.*
- *A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside A fuel-fired space heater is not properly vented or lacks available combustion air.*
- *A non-vented space heater is present Safety devices on a fuel-fired space heater are missing or damaged.*
- *The chimney or venting system on a fuel-fired heating, ventilation, or cooling system is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting of gas.*
- *Deteriorating paint as defined at 24 CFR 35.110 in a unit built before 1978 that is to be occupied by a family with a child under six years of age if it would prevent the family from moving into the unit.*

Housing Choice Voucher: Chapter 8

Change

Details

Chapter 8

Owner and
Family
Responsibilities

Updated

- Corrections to existing language:

LHC will consider the family to have breached HQS when:

- *tenant-paid utilities were never placed in service*
- *tenant-paid utilities are no longer in service*
- *the family obtains tenant-paid utilities in an illegal manor*
- *the family fails to maintain any appliances that the owner is not required to provide under the lease*
- *any member of the household or guest damages the dwelling unit beyond normal wear and tear and for which the security deposit does not cover*

Housing Choice Voucher: Chapter 8

Change

Details

Chapter 8

Violations of
HQS Space
Standards

Added

- If LHC determines that a unit is overcrowded because of an increase in family size or a change in family composition, LHC must issue the family a new voucher, and the family and LHC must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, LHC must terminate the HAP contract in accordance with its terms.
- LHC Standard Operating Procedure
 - *If a family member has been approved for an extra bedroom as a Reasonable Accommodation for medical equipment, separate sleeping room for the person with a disability, or a live-in aide, LHC will verify at each inspection whether or not the extra bedroom is being utilized as approved in the reasonable accommodation.*
 - *Examples of improper use of the extra bedroom include but are not limited to:*
 - *size of equipment does not warrant an extra bedroom*
 - *no medical equipment present in the extra bedroom*
 - *bedroom not utilized as a bedroom for live in aide*
 - *bedroom not utilized as a bedroom for the person with a disability*
- LHC will also verify annual the need for the reasonable accommodation as part of the annual certification process.

Housing Choice Voucher: Chapter 8

Change

Details

Chapter 8

Violations of
HQS Space
Standards

Added

- *Remote Video Inspections (RVIs) [Notice PIH 2020-31] As an alternative to some or all on-site inspections, the PHA may, but is not required to, perform HQS inspections from a remote location using video streaming technology and a proxy at the inspection site. Since there may be some circumstances in which the application of technology provides insufficient information or evidence to allow the PHA to make appropriate determinations about whether a condition violates HQS, Notice PIH 2020-31 requires that if a PHA chooses to implement RVIs, the PHA should have policies and procedures in place to address such limitations.*
- *LHC Standard Operating Procedure*
 - *LHC may opt to conduct HQS inspections using RVI in accordance with PIH Notice 2020-31.*

Updated

- Inspection time changed from 8:00am – 5:00pm to 8:00am – 7:00pm.

Chapter 8

Initial HQS
Inspections

Updated

- Changed will not to may for *“The PHA may rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.”*

Housing Choice Voucher: Chapter 8

Change

Details

Chapter 8

Annual/Biennial
HQS
Inspections

Remove

- *“Each unit under HAP contract must be inspected within 24 months of the last full HQS inspection. The PHA will not rely on alternative inspection standards. Shelter Plus Care and PSH units will be inspected within 12 months of the last full HQS inspection.”*

Added

- *“Each unit under HAP contract must be inspected biennially within 730 days of the last full HQS inspection.”*
- *“LHC reserves the right to require annual inspections of any owner at any time.*
- *LHC may elect to conduct Remote Virtual Inspections (RVI) on program units for Biennial inspections to ensure program compliance. In doing so, LHC will follow the guidance outlined in PIH Notice 2020-31.*
- *LHC may elect to use rely on an alternative inspection conducted by another entity if it was within the last 24 months.*

Housing Choice Voucher: Chapter 10

Change

Details

Chapter 10

Initial Billing
Deadline

Updated

- Updated billing the deadline by which the PHA must receive the initial billing notice from the receiving PHA from 60 to 90 days.

Chapter 10

Administering a
Portable
Family's
Voucher

Removed

- *"If a portable family's search for a unit is successful and the receiving PHA intends to administer the family's voucher, the receiving PHA must submit its initial billing notice (Part II of form HUD-52665) (a) no later than 10 business days following the date the receiving PHA executes a HAP contract on behalf of the family and (b) in time that the notice will be received no later than 60 days following the expiration date of the family's voucher issued by the initial PHA [Notice PIH 2008-43]. A copy of the family's form HUD-50058, Family Report, completed by the receiving PHA must be attached to the initial billing notice. The receiving PHA may send these documents by mail, fax, or e-mail."*

Added

- *"If a portable family's search for a unit is successful and the receiving PHA intends to administer the family's voucher, the receiving PHA must submit its initial billing notice (Part II of form HUD-52665) in time that the notice will be received no later than 90 days following the expiration date of the family's voucher issued by the initial PHA [Notice PIH 2016-09]. This deadline may be extended for 30 additional days if the delay is due to a suspension of the voucher's term (see Initial Billing Section). A copy of the family's form HUD-50058, Family Report, completed by the receiving PHA must be attached to the initial billing notice. The receiving PHA may send these documents by mail, fax, or email."*

Housing Choice Voucher: Chapter 10

Change

Details

Chapter 10

Administering a Portable Family's Voucher

Removed

- *“If the receiving PHA fails to send the initial billing within 10 business days following the date the HAP contract is executed, it is required to absorb the family into its own program unless (a) the initial PHA is willing to accept the late submission or (b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is over-leased) [Notice PIH 2008-43].”*

Added

- *“If the receiving PHA fails to send the initial billing by the deadline, it is required to absorb the family into its own program unless (a) the initial PHA is willing to accept the late submission or (b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is over leased) [Notice PIH 2016-09].”*

Updated

- Multiple subsections to reflect more current HUD notices.

Housing Choice Voucher: Chapter 11

Change

Details

Chapter 11

Required Reporting

Updated

- 30 business days to 30 days.

Chapter 11

Optional Reporting

Updated

- Changed reporting timeframe of income or expense increases in excess of \$500 from 10 days to 30 days.

Chapter 11

Method of Reporting

Added

- Notification of changes in writing by completing the LHC HCV Certification Form.
- Changed timeframe to provide required information or documents from 5 days to 10 days.

Housing Choice Voucher: Chapter 13

Change

Details

Chapter 13

Retention

Added

- *“Contacting owners via emails or texts to disseminate information.”*

Chapter 13

Basic HCV
Program
Requirements

Updated

- Website for landlords to post available units.

Housing Choice Voucher: Chapter 15

Change

Details

Chapter 15

Overview

Added

- *“LHC will permit a family to rent a manufactured home when the rental of the unit covers both the manufactured housing and the space.”*

LHC Standard Operating Procedure

- *This housing type is not permitted by LHC except for reasonable accommodation. When approved via a reasonable accommodation, LHC will follow the guidance issued in HUD’s Guidebook on Special Housing Types.*

Part VIII: HUD-Veterans Administration Supportive Housing (VASH) [Federal Register, May 6 and May 19, 2008]

- *The HUD-VASH program combines HUD HCV rental assistance for homeless veterans with case management and clinical services provided by the Department of Veterans Affairs (VA) at its medical centers and in the community. Ongoing VA case management, health, and other supportive services is made available to homeless veterans at many VA Medical Center (VAMC) supportive services sites across the nation. LHC partners the Battle Creek VA Medical Center in Battle Creek, Michigan. LHC administers the Veterans Administration Supportive Housing (VASH) program by following the above Federal Register Notices and subsequent HUD guidance.*

Part IX: Family Self Sufficiency Program [24 CFR Part 984]

- *LHC Administers a Family Self-Sufficiency Program in compliance with 24 CFR Part 984 with funding received from HUD.*

Housing Choice Voucher: Chapter 16

Change

Details

Chapter 16

New Section

Added

- New section about remote meetings for Informal Review Decision

Housing Choice Voucher: Chapter 17

Change

Details

Chapter 17
Overview

Added

- *“Developments that have received a 9% tax credit award, but not through the Permanent Supportive Housing set-aside, will be limited to less than 25% of the total units as Project- Based Vouchers. These proposals must submit a MOU for review and approval, and,”*
- *“Developments that have received a 4% tax credit award will not be limited to the 25% of the total units as Project-Based Vouchers. For proposals of 25% or less, a MOU will be required. For proposals that 25% an Addendum III and MOU will be required.”*

“Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]”

- *“PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.” for PBV housing on different sites.”*

Housing Choice Voucher: Chapter 17

Change

Details

Chapter 17

Owner Proposal
Selection
Procedures

Added

- *“LHC may elect to solicit proposals via a Request for Proposals (RFP) for new initiatives and/or special funding sources. In these instances, LHC will not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.”*

Removed

- *“The LHC will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner.”*
- *“In addition, the LHC will publish its notice for selection of PBV proposals for two consecutive days in the same newspapers and trade journals the LHC used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program.”*
- *“The LHC will make available to any interested party its rating and ranking sheets and documents that identify the LHC basis for selecting the proposal. These documents will be available for review by the public and other interested parties for one month after publication of the notice of owner selection. The LHC will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.”*
- *“The LHC will make these documents available for review at the LHC during normal business hours. The cost for reproduction of allowable documents will be \$1.50 per page.”*

Housing Choice Voucher: Chapter 17

Change

Details

Chapter 17

Subsidy
Layering
Requirements

Added

- New section to cover Subsidy Layering Requirements

Chapter 17

Family Right to
Move

Added

- New Standard Operating Procedure
- New Emergency Transfers under VAWA and Standard Operating Procedure

3

Proposed changes to Annual and Five-Year Plans

Annual Plan and 5-Year Plan

Change

Details

RAD / Section
18 Project
Details

Revised

- Progress on projects and PBRA / PBV blend detail
- Clarifications stating South Washington Park as an elderly and persons with disability waitlist preference not a designated facility

Section 18 –
Sale of
Scattered Sites

Revised

- Unit list and count

Removed

- More Efficient/Effective Low-Income Housing as described in 24 CFR 97.17(b).