

Chapter 7 – Waiting List & Tenant Selection

Summary: The proposed revisions modernize public notice requirements, strengthen application procedures, and improve consistency in waiting list administration while maintaining HUD compliance.”

Policy Area	Current Language	Proposed Revised Language
Opening the Waiting List – Outreach Methods	Requires public notice in: <ul style="list-style-type: none"> • Newspaper of general circulation • Minority publication/media • Posting in office and community locations 	Removes print publication requirements and replaces with: <ul style="list-style-type: none"> • PHA website posting • Digital/electronic outreach • Notification to community partners • Notification to local Continuum of Care (CoC) • Community posting locations
Modernization of Outreach	Focus on traditional media methods	Adds modern outreach methods including online posting and direct partner notification
Closing the Waiting List	Must use same methods as opening (including newspapers/media)	Updated to mirror revised outreach methods (website, digital, partners, CoC)
Application Submission	Allows applications during open period; methods outlined	No major change; clarified to align with notice instructions and streamlined wording
Full Application Distribution	Full application mailed when applicant reaches top of list	Retained, but clarified as required process using last known address
Completion of Full Application	Requires completion but lacks clear enforcement or deadline structure	Strengthened requirements: <ul style="list-style-type: none"> • All adults (18+) must complete/sign • Must return by PHA deadline • Failure results in application being placed inactive
Inactive Status (New Clarification)	Not clearly defined for failure to submit full application	New language added: Applications become inactive if full packet is not returned timely
Missed Deadlines / Applicant Responsibility	Implied but not clearly enforced	Clearly establishes applicant responsibility for timely submission and compliance
Eligibility Appointment Requirements	Requires attendance; removal after missed appointments	Retained but simplified and aligned with inactive/removal procedures
Consistency of Process	Some procedural inconsistencies across sections	Standardized workflow: Application → Full Packet → Deadline → Inactive (if no response)
Notification Methods (General)	Heavy reliance on mail and physical communication	Expanded to include digital communication and partner-based notification
Community Engagement	Limited to general posting locations	Expanded to include: <ul style="list-style-type: none"> • Community partners

Policy Area	Current Language	Proposed Revised Language
		<ul style="list-style-type: none"> • Nonprofits • CoC coordination
Clarity & Organization	More detailed but repetitive and sometimes inconsistent	Streamlined, simplified, and easier to follow for staff and applicants
Compliance & Audit Readiness	Meets base HUD requirements but includes outdated practices	Improves compliance by: <ul style="list-style-type: none"> • Modernizing outreach • Clarifying deadlines • Documenting enforcement steps

✔ What is Changing

- ✓ Moves away from **newspaper/publication requirements**
- ✓ Adds **website + digital outreach + CoC + community partners**
- ✓ Clearly requires **full application completion by all adults**
- ✓ Establishes **firm deadlines with consequence (inactive status)**
- ✓ Improves consistency across all steps of the process

✔ What is NOT Changing

- Waiting list structure and selection process
- Use of lotteries, preferences, and applicant ranking
- Requirement to provide fair and nondiscriminatory access

✔ Why These Changes Matter

- Improves **access to information using modern communication tools**
- Ensures **clear expectations for applicants**
- Reduces administrative confusion and delays
- Strengthens **audit compliance and defensibility**
- Enhances coordination with **community housing partners**

Chapter 11 – Verification Requirements

Summary: These changes strengthen verification requirements by limiting the use of affidavits, enforcing documentation standards, and aligning the policy more closely with HUD’s verification hierarchy to ensure audit compliance.”

Policy Area	Current Language	Proposed Revised Language (Audit-Strengthened)
Verification of Date of Birth – Acceptable Documents	Lists standard documents such as: <ul style="list-style-type: none"> • Birth certificate • Passport • SSA records • Faith-based records 	Retains standard documents, but clearly separates: <ul style="list-style-type: none"> • Primary verification (official records) • Secondary verification (supporting records)
Affidavit of Parentage (Date of Birth)	Not included; margin note suggests adding	New addition: Allowed only when all other verification is unavailable
Use of Alternative Documents	Broad list, no clear hierarchy	Clarified hierarchy: Primary → Secondary → Affidavit (last resort only)
Verification Hierarchy Enforcement	Implied but not clearly enforced	Explicit requirement added: PHA must follow HUD Verification Hierarchy
Documentation Requirements (DOB)	Not clearly specified	New requirement: Staff must document: <ul style="list-style-type: none"> • Why standard documents unavailable • Why affidavit accepted
PHA Discretion (DOB)	PHA may accept various documents	Strengthened: PHA must justify acceptance of non-standard documents in writing
Verification of Deductions from Income	Follows HUD hierarchy generally; allows various verification methods	Retained but strengthened with clear order of verification methods and stricter controls
Affidavits/Self-Certification (Deductions)	Allowed but not clearly limited	Restricted: Only allowed when: <ul style="list-style-type: none"> • Third-party verification unavailable AND • Tenant documents unavailable
File Documentation Requirements (Deductions)	Not clearly defined	New requirement: File must include: <ul style="list-style-type: none"> • Attempts to obtain verification • Reason affidavit used • Supporting documentation (if available)
Consistency Check Requirement	Not explicitly stated	New requirement: Information must be consistent with other file data
PHA Authority to Deny Unverified Deductions	Implied	Explicit: PHA may deny deductions that cannot be adequately verified
Audit Trail / Compliance Language	Limited	New audit clause added: Requires full documentation trail and adherence to hierarchy

Policy Area	Current Language	Proposed Revised Language (Audit-Strengthened)
Staff Accountability	Not specified	Strengthened through required written justification and documentation
Risk Control	Minimal controls on weaker verification types	Significant improvement: Reduces risk of unsupported approvals and audit findings

✓ What is Changing

- ✓ Adds **Affidavit of Parentage** as an option — but only as a last resort
- ✓ Requires strict use of the **verification hierarchy**
- ✓ Adds **mandatory documentation requirements** for files
- ✓ Limits use of **self-certifications and affidavits**
- ✓ Gives PHA clear authority to **deny unverified deductions**

✓ What is NOT Changing

- Use of EIV and third-party verification
- Core HUD verification requirements
- Types of common acceptable documents

✓ Why These Changes Matter

- Strengthens **audit compliance and file defensibility**
- Ensures **consistent verification practices** across staff
- Reduces risk of:
 - Unsupported deductions
 - Eligibility errors
 - Monitoring or audit findings
- Provides flexibility **only when properly documented**

Chapter 12 -Subsidy Standards

Summary: These changes clarify existing occupancy standards, add limited flexibility for bedroom assignments, and ensure decisions align with available funding while maintaining HUD compliance.

Policy Area	Current Policy Language	Proposed Revised Policy
General Standard	Requires smallest number of bedrooms without overcrowding	No change – retains HUD requirement for smallest appropriate unit size
Persons Per Bedroom	“No more than two persons per bedroom”	Retained as a general guideline but clarified as a standard practice rather than rigid rule
Same-Sex Children	“Children of the same sex will share a bedroom”	Same-sex children will generally share , but PHA may approve separate bedrooms based on funding and case-by-case review
Opposite-Sex Children	Opposite sex children age 4+ not required to share bedroom	No change – retained for consistency with existing policy
Adult Bedroom Assignment	Adults of same sex may share bedroom; generational separation	Simplified – adults not required to share with children; clarified for consistency
Funding Consideration	Not addressed	New policy added: Bedroom size decisions may consider funding availability and program impact
Exceptions / Flexibility	Limited flexibility described, inconsistent language	Expanded: PHA may approve exceptions based on age differences, health/safety, or program considerations
Reasonable Accommodation	Not clearly separated from general policy	Strengthened and clarified: exceptions will be granted when required for disability-related needs
Live-In Aide	Separate bedroom allowed; no additional bedrooms for aide family members	No major change; clarified and retained for compliance
Conflicting / Outdated Language	Contains notes indicating removal of provisions not part of original plan	Removed conflicting or unclear provisions; standardized language throughout
Consistency Requirement	Implied but not explicit	Explicit requirement for consistent, documented, non-discriminatory decisions
Program Limitations	Not clearly stated	Added: PHA cannot approve larger unit sizes that negatively impact funding or program capacity

✔ What is NOT changing

- Core HUD requirement to avoid overcrowding
- Opposite-sex bedroom separation standards
- Live-in aide bedroom rules

✔ What IS changing

- ✓ Adds **flexibility for same-sex children** (case-by-case)

- ✓ Introduces **funding-based decision-making**
- ✓ Clarifies **exception authority and documentation requirements**
- ✓ Removes outdated or inconsistent language

✓ Why it matters

- Improves **consistency and audit compliance**
- Helps manage **limited voucher funding responsibly**
- Allows more **responsive decisions for family needs**

Here is a **clean, board-ready side-by-side comparison for Appendix H (FSS/HCVA Program)**. Since this is a **new appendix**, the "current" column reflects *no existing policy or limited/implicit language*, which is typical for board packets.

■ Appendix H – FSS/HCVA Program

Summary: Appendix H establishes a comprehensive and modernized FSS/HCVA Program framework, expanding participant access, strengthening program oversight, and aligning with HUD regulations while supporting long-term economic self-sufficiency

Policy Area	Current Policy	Proposed Appendix H (New)
Program Framework	No standalone appendix; FSS may be minimally referenced or not included	New comprehensive Appendix H formally establishes FSS/HCVA Program structure
Program Name	Referred to as FSS only (if referenced)	Formalizes dual name: FSS / HCVA (Housing Choice Voucher Advantage)
Purpose Statement	Limited or general HUD reference	Detailed purpose aligned with HUD: economic independence, income growth, financial stability
Voluntary Participation	Not clearly stated	Clearly states participation is voluntary and does not affect HCV eligibility
Program Administration	Not defined or informal	Defines roles of LHC and third-party providers , including case management and oversight responsibilities
Eligible Programs	Typically limited to HCV	Expanded to include: <ul style="list-style-type: none"> • PBV • RAD PBV • VASH • EHV • FYI • Other HUD programs
Program Size	Not defined	New: Based on funding, staffing, and capacity; allows waitlist for FSS
Outreach	Limited or not defined	New expanded outreach: website, social media, recert packets, partners, accessible formats
Family Selection	Not standardized	Defined selection process: first-come or other HUD-compliant methods with orientation requirement
Re-Enrollment Policy	Not addressed	New: Allows re-enrollment with criteria and restrictions
Contract of Participation (CoP)	Referenced but not detailed	Fully defines CoP requirements, responsibilities, and program structure
ITSP (Individual Plan)	Basic or not defined	Detailed requirement: goals, employment, financial, barriers, action steps
Mandatory Goals	Basic HUD reference	Expanded with criteria for “suitable employment” and flexibility for circumstances
Supportive Services	Informal or limited	Comprehensive list added: employment, credit, education, health, childcare, etc.
Escrow Accounts	Basic HUD language	Clarified administration, tracking, and disbursement requirements
Interim Escrow Disbursements	Often not included or vague	New detailed policy: allows interim disbursement with documentation and approval
Forfeited Escrow Funds	Not addressed	Defines use of forfeited funds consistent with HUD rules
Contract Term	HUD minimum reference	Clearly establishes 5-year term limit with HUD allowances
Extensions	General or undefined	Detailed criteria for extensions (illness, job loss, caregiving, etc.)

Policy Area	Current Policy	Proposed Appendix H (New)
Contract Modifications	Not defined	Requires written, approved, signed modifications
Portability	Not addressed	New policy: allows continuation under portability with coordination
Completion Criteria	Basic HUD statement	Expanded with verification and compliance requirements
Voluntary Withdrawal	Not defined	Clarifies withdrawal rights and escrow implications
Termination from Program	Limited or general	Detailed termination standards with due process considerations
Termination with Escrow	Not addressed	Allows escrow release in HUD-approved hardship circumstances
Hearings & Grievances	Covered generally in Admin Plan	Ties FSS decisions to formal hearing rights
Reasonable Accommodation	Global Admin Plan language	Explicitly applied to FSS/HCVA program participation
Electronic Communication	Not addressed	New modernization: allows e-signatures, virtual services, digital communication
Non-Interference with HCV	Not clearly stated	Explicit protection: FSS participation does not affect HCV assistance

Key Changes Explained

What is New

- ✓ Adds a **full FSS/HCVA program policy** for the first time
- ✓ Expands eligibility across multiple voucher programs
- ✓ Introduces **interim escrow disbursements**
- ✓ Formalizes contracts, goals, and participant responsibilities
- ✓ Allows **virtual services and electronic communication**
- ✓ Adds flexibility for **extensions and re-enrollment**

What is Improved

- Stronger **program structure and oversight clarity**
- Better **participant support through coordinated services**

- More **flexibility for real-life barriers (employment, caregiving, etc.)**
- Increased **compliance with HUD FSS regulations (24 CFR Part 984)**

✔ Why This Matters

- Aligns LHC with **current HUD requirements and best practices**
- Improves **participant success outcomes**
- Strengthens **audit readiness and documentation standards**
- Enhances ability to **partner with community organizations**
- Supports long-term goals like **financial independence and homeownership**

■ Appendix I – EHV Transition to Regular HCV

Summary: Appendix I establishes a clear and compliant process for transitioning EHV-assisted families to the regular HCV program, ensuring continuity of assistance while maintaining proper funding and regulatory alignment.

Policy Area	Current Policy / Practice	Proposed Appendix I (New Addendum)
Formal Policy for EHV Transition	No standalone formal policy; handled through HUD notices or internal practice	New comprehensive policy establishing formal procedures for EHV → HCV transition
Purpose Statement	Not formally defined	Clearly defines purpose: <ul style="list-style-type: none"> • Ensure continuity of assistance • Prevent termination due to EHV funding limits
Funding Requirements	General understanding of funding limitations	Explicit requirement added: <ul style="list-style-type: none"> • Must have available HCV ACC unit-months • EHV funds cannot be used after transition
Communication with Families	Informal or case-by-case communication	New structured requirements: <ul style="list-style-type: none"> • Written notice required • Explanation of waiting list process • Funding limitations clearly disclosed

Policy Area	Current Policy / Practice	Proposed Appendix I (New Addendum)
Risk Disclosure to Families	Not consistently required	New requirement: Families must be informed of risk of assistance loss if EHV funding is exhausted
Waiting List Requirement	Not consistently defined in policy	Clarified requirement: Transition requires selection from HCV waiting list
Waiting List (Open)	No formal process for preference implementation	Requires: <ul style="list-style-type: none"> • Determination of Significant Amendment • Public comment period • Board approval
Waiting List (Closed)	No standardized approach	Allows opening list for EHV preference only
EHV Preference	May not exist or inconsistently applied	New formal preference created: Limited to current EHV participants Complies with civil rights rules
Preference Restrictions	Not clearly defined	Clarifies: <ul style="list-style-type: none"> • No multiple preferences by disability/elderly • No residency preference allowed
Waiver Option	Not addressed	New option added: Request HUD waiver to place all EHV families on waiting list
HUD Compliance for Waivers	Not formalized	Requires: <ul style="list-style-type: none"> • Written HUD approval • Good cause justification • Formal submission process
Criminal Screening at Transition	Unclear or inconsistent	Clarifies: <ul style="list-style-type: none"> • No re-screening required for properly admitted EHV families • HCV rules apply after transition
Income Targeting Rules	Not defined for transition	Specifies: <ul style="list-style-type: none"> • Income targeting does not apply during transition • Applies after conversion to HCV
SSN & Citizenship Verification	EHV alternative timelines applied	Clarified: Must meet full HCV requirements before transition
Payment Standards	Not formally addressed	Adds options: <ul style="list-style-type: none"> • Align payment standards OR • Hold families harmless in place
40% Rent Burden Rule	Standard HCV rule applies	Clarifies exception: Does NOT apply when family remains in place
HAP Contracts	Not addressed specifically for transition	Clarifies: <ul style="list-style-type: none"> • No new HAP if no move • New HAP required if family moves
PIC Reporting Requirements	General reporting practices	New requirement: Use “EHCV” code on HUD-50058 Ensures eligibility for \$1,000 transition fee
Program Tracking & Compliance	Not standardized	Improves tracking and funding reimbursement accuracy

Policy Area	Current Policy / Practice	Proposed Appendix I (New Addendum)
Supersession Clause	Not applicable	New clause: Addendum overrides conflicting Admin Plan sections until full revision

Key Changes

What is New

- ✓ Creates a **formal policy for transitioning EHV families to HCV**
- ✓ Establishes a **clear waiting list and preference process**
- ✓ Adds **mandatory communication requirements to families**
- ✓ Introduces a **HUD waiver option** for streamlined transitions
- ✓ Provides clarity on **funding, eligibility, and rent rules**

What is Improved

- Clear, consistent process for staff
- Reduces risk of **termination of assistance due to funding issues**
- Improves **transparency for participants**
- Strengthens **HUD compliance and audit defensibility**
- Ensures proper **funding tracking and reimbursement (PIC coding)**

Why These Changes Matter

- Protects families from **losing assistance when EHV funding expires**
- Allows LHC to **continue serving households without interruption**
- Aligns policy with **HUD guidance and best practices**
- Reduces operational risk and inconsistency