

## **EXHIBIT A**

### **EHV Administrative Plan Amendment**

CRHA is providing this Amendment to its Section 8 Housing Choice Voucher Administrative Plan to establish provisions rules that are specific to the administration of the Emergency Housing Voucher. All parties involved in the administration of EHV shall follow the current rules in the HCV Administrative Plan (linked below) except as otherwise specified here or in any future guidance issued by CRHA. Where there is a conflict between CRHA's rules and federal regulations, the federal regulation shall prevail. If a CoC is aware of any such conflict, it shall inform CRHA of that conflict as soon as possible.

<https://www.cvillerha.com /section-8-housing-programs>

### **3.03 Emergency Housing Vouchers (EHV)**

CRHA elects, as authorized by Section 3202 of the American Rescue Plan Act and HUD (through award notification and PIH Notice 2021-15), to administer Emergency Housing Vouchers (EHV) to transition people experiencing or at risk of homelessness, including those whom are survivors of domestic violence or human trafficking, to stable housing. Emergency housing vouchers are administered within all applicable HUD and CRHA's Administrative Plan operating requirements. The vouchers' main purpose is to assist eligible individuals and families who would have difficulty being stably housed otherwise.

EHV's will be administered as tenant-based assistance through a single or multiple Continuums of Care (CoC). CRHA will partner with one or more Continuums of Care (CoC) and/or Victim Service Providers (VSPs) for direct referrals and services. CRHA will execute a Memorandum of Understanding ("MOU") with each CoC participating in its EHV program, as required in PIH Notice 2021-15. This Administrative Plan Amendment, as well as any future changes to it, will become a part of the MOU.

#### **3.03.01 Eligibility Requirements**

Eligibility assessment must be conducted, and referrals received, by and through either the Continuum of Care's (CoC) Coordinated Entry (CE) System or through another acceptable method as stipulated in the CoC's MOU with CRHA. Additional program eligibility will be determined by the CRHA based on the family's total annual gross income, household size and other applicable eligibility qualifications.

To be eligible for an EHV preference, an individual or family must meet one of three eligibility priorities as defined below, listed in order of preference:

#### **Priority 1 –**

1. Households determined by the CoC as meeting the definition of chronically homeless.
2. Any literally homeless families with minor children 18 years of age or younger.
3. Households who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
4. Households participating in a Rapid Re-housing (RRH) program who would qualify for such assistance as defined by the terms of the federal Emergency Solutions Grant ("ESG") program.

#### **Priority 2 –**

1. Any household classified as literally homeless.

a. All individuals and families classified as meeting any of the definitions above must be referred by the CoC, or its designee.

As applicable, the CoC or referring agency must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance. CRHA must retain this documentation as part of the family's file.

#### **IV.C. PHA SCREENING**

##### Overview

HUD waived 24 CFR 982.552 and 982.553 in part for the EHV applicants and established alternative requirement for mandatory and permissive prohibitions of admissions. Except where applicable, PHA policies regarding denials in Chapter 3 of this policy do not apply to screening individuals and families for eligibility for an EHV. Instead, the EHV alternative requirement listed in this section will apply to all EHV applicants.

The mandatory and permissive prohibitions listed in Notice PIH 2021-15 and in this chapter, however, apply only when screening the individual or family for eligibility for an EHV. When adding a family member after the family has been placed under a HAP contract with EHV assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, CRHA must approve additional family members and may apply its regular HCV screening criteria in Chapter 3 in doing so.

##### Mandatory Denials

Under alternative requirements for the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(1)(ii)(C), which prohibits admission if any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

CRHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

##### CRHA Policy

CRHA will deny admission to the program if any adult member (or head of household or spouse, regardless of age) fails to sign and submit consent forms, the PHA will first notify the family of the limited EHV grounds for denial of admission as part of the notice of denial that will be mailed to the family.

##### **Permissive Denial**

Notice PIH 2021-15 lists permissive prohibitions for which the PHA may, but is not required to, deny admission to EHV families. The notice also lists prohibitions that, while allowable under the HCV program, may not be used to deny assistance for EHV families.

If the PHA intends to establish permissive prohibition policies for EHV applicants, the PHA must first consult with its CoC partner to understand the impact that the proposed prohibitions may have on referrals and must take the CoC's recommendations into consideration.

### CRHA Policy

In consultation with the CoC, CRHA will apply permissive prohibition to the screening of EHV applicants. Determinations using permissive prohibitions will be made based on an individualized assessment of relevant mitigating information in accordance with policies in Section 3-III.E.

CRHA will establish the following permissive prohibitions:

CRHA determines that any household member is currently engaged in, or has engaged in within the previous 12 months:

Violent criminal activity

Other criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity

If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous 12 months.

If the family engaged in or threatened abusive or violent behavior toward PHA personnel within the previous 12 months.

CRHA will also deny assistance to household members already receiving assistance from another program in accordance with Section 9.h. of Notice PIH 2021-15.

Prohibitions based on criminal activity for the eligible EHV populations regarding drug possession will be considered apart from criminal activity against persons (i.e., violent criminal activity).

In compliance with PIH 2021-15, the PHA will not deny an EHV applicant admission regardless of whether:

Any member of the family has been evicted from federally assisted housing in the last five years;

A PHA has ever terminated assistance under the program for any member of the family;

The family currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act;

The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;

The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA; The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with 24 CFR 982.553(a)(3);

The PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

### **3.03.02 Partnering Agency**

CRHA is executing MOUs to accept referrals for EHV's from organizations permitted under PIH 2021-15 ("partnering agency"). This may include but is not limited to Continuums of Care (CoCs), Victim Service Providers ("VSPs") or other eligible entities which serve the target population. In order to participate CRHA's EHV program, eligible entities must work through the CoC in their City or Counties or service area. Referrals will only be accepted from CoCs that agree to the terms of the MOU provided by CRHA within the required timeframe. Each participating CoC must designate a Lead Agency, and that entity is required to devise a process to accept referrals from any other qualified, partnering agencies within the CoC's county or service area. Lead Agencies are encouraged to utilize the Coordinated Entry ("CE") System. COC will be responsible for complying with the terms of CRHA's MOU with each CoC.

### **3.03.03 EHV Requirements, Exceptions and Waivers**

Emergency Housing Vouchers are administered in a manner similar to Section 8 Housing Choice Vouchers. The COC must follow HUD rules as well as requirements contained within CRHA's HCV Administrative Plan, with exceptions for the following provisions:

## **Waiting List and Selection of EHV participants**

### **III. A. HCV WAITING LIST**

The regulation that requires the PHA to admit applicants as waiting list admissions or special admissions in accordance with admission policies in Chapter 4 does not apply to PHAs operating the EHV program. Direct referrals are not added to the PHA's HCV waiting list.

CRHA must inform families on the HCV waiting list of the availability of EHV's by, at a minimum, either by posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2021-15.

#### **CRHA Policy**

CRHA will post information about the EHV program for families on the PHA's HCV waiting list on their website. The notice will:

Describe the eligible populations to which EHV's are limited

Clearly state that the availability of these EHV's is managed through a direct referral process

Advise the family to contact the CoC (or any other PHA referral partner, if applicable) if the family believes they may be eligible for EHV assistance

CRHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The PHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

### **III.B. EHV WAITING LIST**

The HCV regulations requiring the PHA to operate a single waiting list for admission to the HCV program do not apply to PHAs operating the EHV program. Instead, when the number of applicants referred by the CoC or partnering agency exceeds the EHV's available, the PHA must maintain a separate waiting list for EHV referrals, both at initial leasing and for any turnover vouchers that may be issued prior to September 30, 2023.

Further, the EHV waiting list is not subject to PHA policies in Chapter 4 regarding opening and closing the HCV waiting list. The PHA will work directly with its CoC and other referral agency partners to manage the number of referrals and the size of the EHV waiting list.

There will be no open waiting lists for this program. Only families referred by the CoC Lead Agency will be accepted. CRHA will establish a waiting list for each participating CoC comprised entirely of referrals received from the CoC Lead Agency.

The CoC Lead Agency and each partnering agency must be equipped to certify eligibility status by determining whether a family qualifies under one of the two categories for EHV's. They will also be asked to refer households in order based on the priorities and timetable listed in the MOU during the initial lease-up Phase.

Additionally, CoCs are encouraged to leverage other resources available within their service area to assist EHV applicants and participants, including make connections to supportive services for to short-term or long-term case management, housing counseling, utility payments programs (e.g. the Home Energy Assistance Program), job training, health and nutrition programs, and other social services.

COC must provide documentation to the CRHA of their verification that the family meets one of the two eligible categories for EHV assistance. CRHA and COC must retain this documentation as part of the family's file.

If a family reaches out directly to the CRHA requesting an EHV, unless they are requesting an emergency transfer in accordance with Violence Against Women Act as outlined in CRHA's Emergency Transfer Plan outlined in Section 28.0 in the CRHA Section 8 Housing Choice Voucher Administrative Plan, CRHA must refer that family to their Lead Agency (COC) for initial intake, assessment, and possible referral back for EHV assistance.

Each CRHA HCV Local Administrator must also initially canvas their tenant-based waiting list and refer any applicant that initially qualified for the homeless preference to the Lead Agency for the CoC in their service area. The CoC will determine whether the family is eligible for an EHV (based on the qualifying definition for EHV assistance for homelessness or another eligible category as applicable). The CoC will also determine if the family is eligible for other homeless assistance through the HMIS system.

#### **Local Preferences (§ 982.207(a) waived).**

##### **HCV Waiting List Preferences**

If local preferences are established by the PHA for HCV, they do not apply to EHV's. However, if the PHA has a homeless preference or a VAWA preference for the HCV waiting list, the PHA must adopt additional policies related to EHV's in accordance with Notice PIH 2021-15.

## CRHA Policy

The PHA does not offer either a homeless or a VAWA preference for the HCV waiting list.

### **EHV Waiting List Preferences**

With the exception of a residency preference, the PHA may choose, in coordination with the CoC and other referral partners, to establish separate local preferences for EHV. The PHA may, however, choose to not establish any local preferences for the EHV waiting list.

## CRHA Policy

No local preferences have been established for the EHV waiting list. Per HUD guidance, CRHA will not permit local preferences in EHV. We do not presently have a local preference in HCV.

### **Restrictions on Denial (§982.552 and § 982.553 waived).**

The alternative requirements for prohibition of admission for EHV applicants are as follows:

A) Unlike regular HCV admissions, CRHA may not deny an EHV applicant admission regardless of whether:

- Any member of the family has been evicted from federally assisted housing
- The family has ever been terminated from assistance under the program for any member of the family.
- The family currently owes rent or other amounts to a PHA in connection with Section 8 or public housing assistance under the 1937 Act.
- The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
- The family breached an agreement with a PHA to pay amounts owed to a PHA, or amounts paid to an owner by an LA/PHA.
- The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with §982.553(a)(3).
- CRHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

B) Addition of a Family Member

When adding a family member after the family has been placed under a HAP contract with EHV assistance, the regulations at § 982.551(h)(2) apply. Other than the birth, adoption or court awarded custody of a child, the CRHA must approve additional family members and should apply its regular screening criteria in doing so.

C) Mandatory Prohibitions still apply

(1) CRHA must continue to apply the standards it established under § 982.553(a)(1)(ii)(C) that prohibit admission if any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing to EHV applicants.

(2) CRHA must continue to apply the standards it established under § 982.553(a)(2)(i) that prohibit admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program to EHV applicants.

(3) CRHA must still deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information in accordance with 24 CFR part 5 as required by § 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

### **Income Targeting Requirement (§ 982.201(b)(2) waived).**

CRHA is applying HUD guidance waiving the income targeting requirements of section 16(b) of the United States Housing Act of 1937 and § 982.201(b)(2) for EHV families so that the CRHA can effectively serve individuals and families in all eligible EHV income levels. The PHA may still choose to include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

#### CRHA Policy

CRHA will not include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

### **Pre-Inspection of Units**

To expedite the leasing process, CRHA is utilizing the flexibility provided in PIH Notice 2021-15 regarding pre-inspections. CRHA shall pre-inspect available units that EHV families may be interested in leasing in order to maintain a pool of eligible units.

#### CRHA Policy

To expedite the leasing process, the PHA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.

The family will be free to select his or her unit.

When a pre-inspected unit is not selected, the PHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required re-inspections.

### **Inspections**

#### **Initial Search Term (§ 982.303(a) waived)**

Unlike the standard HCV program, which requires an initial voucher term of at least 60 days, EHV vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Section 5-II.E. will apply.

#### CRHA Policy

All EHV's will have an initial term of 120 calendar days.

CRHA will allow up to two 30-day extensions, to be evaluated on a case-by-case basis. Additional extension may be granted in the case of a reasonable accommodations. Any extensions, suspensions, and progress reports will remain consistent under the policies in CRHA's Administrative Plan but will only apply after the minimum 120-day initial search term.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension.

## **Lease Term**

Section 8(o)(7)(A) of the United States Housing Act of 1937 and § 982.309(a)(2)(ii) are waived. CRHA is adopting the waiver providing for an initial lease term for an EHV family of less than 12 months regardless of whether the shorter term is a prevailing market practice.

## **Portability**

The normal HCV portability procedures and requirements outlined in Chapter 10 generally apply to EHV's. Exceptions are addressed below.

### **Nonresident Applicants**

Under EHV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied, regardless of PHA policy in Section 10-II.B.

Section 8(r)(1)(B)(i) of the United States Housing Act of 1937 and § 982.353(c) are waived. No residency preference may apply to EHV's nor is there any prohibition on portability for nonresident applicants. In order to provide maximum housing choice for the targeted populations, HUD is removing the portability restriction for EHV nonresident applicants to allow all EHV families to immediately move under portability. CRHA may not restrict an EHV family from exercising portability because they are a non-resident applicant.

### **Portability billing and absorption**

As per HUD Notice, 2021-05, a receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether the PHA does or does not currently administer EHV's under its own ACC.

If the EHV family moves under portability to another PHA that administers EHV's:

- The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do).
- If the PHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.
- Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving



PHA's EHV policies, although neighboring PHAs and PHAs in the same metro area or region are strongly encouraged to work collaboratively with one another to align EHV policies and help facilitate EHV portability moves between their jurisdictions.

If the EHV family moves under portability to another PHA that does not administer EHV under its own ACC, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

#### *Family briefing/initial PHA and receiving PHA coordination on services*

In addition to the applicable family briefing requirements at § 982.301(a)(2) as to how portability works and how portability may affect the family's assistance, the initial PHA must inform the family how portability may impact the special EHV services and assistance that may be available to the family.

The initial PHA is required to help facilitate the family's portability move to the receiving PHA and inform the family of this requirement in writing taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).

#### CRHA Policy

In addition to following PHA policy on briefings in Chapter 5, as part of the briefing packet for EHV families, the PHA will include a written notice that the PHA will assist the family with moves under portability.

For limited English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA's LEP plan (See Chapter 2).

#### **Coordination of Services**

If the portability move is in connection with the EHV family's initial lease-up, the receiving PHA and the initial PHA must consult and coordinate on the EHV services and assistance that will be made available to the family.

#### CRHA Policy

For EHV families who are exercising portability, when the PHA contacts the receiving PHA in accordance with Section 10-II.B. Preapproval Contact with Receiving PHA, the PHA will consult and coordinate with the receiving PHA to ensure there is no duplication of EHV services and assistance, and ensure the receiving PHA is aware of the maximum amount of services fee funding that the initial PHA may provide to the receiving PHA on behalf of the family.

#### **Services Fee**

Standard portability billing arrangements apply for HAP and ongoing administrative fees for EHV families.

For service fees funding, the amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the receiving PHA or \$1,750, unless the initial PHA and receiving PHA mutually agree to change the \$1,750 cap. Service fees are paid as follows:

- If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA, regardless of whether the receiving PHA bills or absorbs.
- If the receiving PHA administers EHV, the receiving PHA may use its own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance.
- If the receiving PHA does not administer EHV, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

### **Placement Fee/Issuance Reporting Fee**

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement fee/issuance reporting fee. The receiving PHA is eligible for the placement fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee/issuance reporting fee, as applicable.

### **Payment Standards**

§ 982.503(a)(3) waived. An alternative requirement has been established permitting a PHA to establish separate higher payment standards for the EHV in order to increase the potential pool of available units for EHV families. The separate EHV payment standard must comply with all other HCV requirements under § 983.503. In addition, § 982.503(b)(1)(i) is waived allowing CRHA to establish a payment standard amount for a unit size at any level between 90 percent and 120 percent (as opposed to 110 percent) of the published FMR for that unit size.

CRHA is utilizing FMRs for the purposes of the EHV program.

Payment standards are subject to change at CRHA’s discretion.

### **Rent Reasonableness**

All rent reasonableness requirements apply to EHV units, regardless of whether the PHA has established an alternative or exception EHV payment standard.

### **Housing Search Assistance**

Housing search assistance is an additional requirement, which must be conducted for each voucher recipient during their initial search in the EHV program. This may be accomplished directly by the CoC or contracted through a partnering agency. It is a broad term which can include many activities, but with respect to this requirement it must at minimum (1) help individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low poverty neighborhoods, (2) provide transportation assistance and directions to potential units, (3) conduct owner outreach, (4) assist with the completion of rental applications and PHA forms, and (5) help

expedite the EHV leasing process for the family. Other recommended, but not required, housing search activities include helping individual families identify barriers to leasing (e.g., low credit score, evictions history) and strategies to address these barriers, workshops on how to conduct an effective housing search, enhanced support for portability processing, regular proactive check-ins for families searching with a voucher, regular reminders to the family of their voucher expiration date and extension policies, and a dedicated landlord liaison for EHV voucher families.

## **Program Term**

All emergency housing vouchers must be issued no later than Sept. 30, 2023. After September 30, 2023 CRHA may not issue a new emergency housing voucher nor reissue any emergency housing vouchers when a family's assistance ends. All existing and eligible participants on the program will remain assisted on the EHV program until either they request to be removed, become ineligible or the program terminates on September 30, 2030, whichever comes first. Upon termination of the EHV program in its entirety on September 30, 2030, any and all remaining eligible voucher holders will be absorbed into CRHA's HCV program and issued housing choice vouchers within the jurisdiction they currently reside.

All EHV's under lease on or after October 1, 2023, may not under any circumstances be reissued to another family when the participant leaves the program for any reason.

An EHV that has never been issued to a family may be initially issued and leased after September 30, 2023, since this prohibition only applies to EHV's that are being reissued upon turnover after assistance to a family has ended. However, HUD may direct PHAs administering EHV's to cease leasing any unleased EHV's if such action is determined necessary by HUD to ensure there will be sufficient funding available to continue to cover the HAP needs of currently assisted EHV families.

The COC is encouraged to help families to lease-up emergency housing vouchers as quickly and efficiently as possible. With knowledge that the initial lease up period is 120 days, CRHA is not permitted to exceed voucher issuance beyond their authorized allocation. In other words, CRHA is prohibited from issuing more vouchers in a specific region than allocated. CRHA is responsible for tracking the status of all vouchers allocated and leased.

## **Income Verification at Admission (Self-Certification)**

CRHA is adopting the waiver regarding self-certification. However, documentation is strongly encouraged at admission.

### **Section 8 Housing Choice Voucher (HCV) Document Checklist**

Documents/Information for Eligibility:

- Birth certificates and proof of Social Security number for every household member
- Photo ID for all adult household members (18 and older)
- Proof of immigration status for any household member not a U.S. citizen (INS document/Green Card)
- Four (4) consecutive paystubs for all employment income
- Current statement of income from SS, SSI, SSDI and state disability (call 855-488-0541 for a state disability benefit letter)
- Current unemployment benefits and/or worker's compensation statement(s)

- Current welfare/SNAP (food stamps) budget letters (including case make-up)
- Current statement(s) and/or court order(s) for child support and alimony
- Current statement of any regular financial contribution received by any member, including but not limited to, any funds to pay bills (must be signed and dated by the person/organization making the contribution)
- Current statement of any other income not listed above
- Three (3) consecutive monthly statements for all checking or savings accounts held solely or jointly by any member
- Current statement for any and all of the following held solely or jointly by any member: stocks, bonds, CDs, life insurance, trusts, annuities, money market accounts and/or any other assets
- If any household member is self-employed, the last filed tax return (1099 and all tax schedules) and most recent ledger
- If you or a spouse/co-head is disabled or 62 or older, current statement(s) showing medical expenses and/or medical insurance premiums
- If you pay for dependent care to allow an adult to go to work or school, a current statement showing care provider, how much you pay for childcare and child(ren) receiving care
- If any household member is a full-time student 18 or older, verification of full-time student status (school transcript)

### **Self-Certification at Admission**

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to the EHV program applicants at admission, and alternatively, PHAs may consider self-certification the highest form of income verification at admission. As such, PHA policies related to the verification of income in Section 7-I.B. do not apply to EHV families at admission. Instead, applicants must submit an affidavit attesting to their reported income, assets, expenses, and other factors that would affect an income eligibility determination.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA's request.

### **CRHA Policy**

Any documents used for verification must be the original (not photocopies) and dated within the 60-day period prior to admission. The documents must not be damaged, altered, or in any way illegible.

Printouts from webpages are considered original documents.

Any family self-certifications must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.

CRHA will incorporate additional procedures to remind families of the obligation to provide true and complete information in accordance with Chapter 14. The PHA will address any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, the PHA will terminate the family's assistance in accordance with the policies in Chapter 12.

## **Recently Conducted Income Determinations**

PHA may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:

- The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and
- The family certifies there has been no change in income or family composition in the interim.

### **CRHA Policy**

The PHA will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.

The family certification must be made in a format acceptable to the PHA and must be signed by all adult family members whose information or status is being verified.

At the time of the family's annual reexamination the PHA must conduct the annual reexamination of income as outlined at 24 CFR 982.516 and PHA policies in Chapter 11.

## **EIV Income Validation**

Once HUD makes the EIV data available to PHAs under this waiver and alternative requirement, the PHA must:

- Review the EIV Income and Income Validation Tool (IVT) reports to confirm and validate family-reported income within 90 days of the PIC submission date;
- Print and maintain copies of the EIV Income and IVT Reports in the tenant file; and
- Resolve any income discrepancy with the family within 60 days of the EIV Income or IVT Report dates.

Prior to admission, CRHA must continue to use HUD's EIV system to search for all household members using the Existing Tenant Search in accordance with PHA policies in Chapter 3. If CRHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program in accordance with Chapter 12.

## **IV.E. SOCIAL SECURITY NUMBER AND CITIZENSHIP STATUS VERIFICATION**

For the EHV program, the PHA is not required to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the EHV program. Instead, PHAs may adopt policies to admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless the PHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

#### CRHA Policy

CRHA will admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with policies in Chapter 7 within 180 days of admission. The PHA may provide an additional 60-day extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If CRHA determines that an ineligible family received assistance, CRHA will take steps to terminate that family from the program in accordance with policies in Chapter 12.

#### **IV.F. AGE AND DISABILITY VERIFICATION**

CRHA may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

#### CRHA Policy

CRHA will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified. If self-certification is accepted, within 90 days of admission, the PHA will verify the information in EIV or through other third-party verification if the information is not available in EIV. The PHA will note the family's file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant's date of birth and/or disability status.

CRHA determines that an ineligible family received assistance, the PHA will take steps to terminate that family from the program in accordance with policies in Chapter 12.

**HQS Initial Inspections** – At this time, CRHA is only permitting emergency inspections necessary for health and safety issues for all units (TBVs and PBVs) and for vacant units at the CRHA's discretion. For occupied units, in order to place the unit under HAP contract and commence making payments, CRHA may rely on the owner's certification that they are not aware of any life-threatening conditions in the unit(s) or on the property. CRHA shall collect a signed certification form from an authorized representative of the property prior to executing a HAP contract. The prescribed form is attached to this guidance. Additionally, for properties built prior to 1978 where the family includes children under the age of 6, CRHA shall also require that the owner submit digital photographs of windows, doors and other friction surfaces. If the agency determines that the photographs demonstrate the presence of lead hazards, they shall require remediation prior to move-in. The period of availability for CRHA to accept an owner's self-certification for an initial inspection ends on March 31, 2022. CRHA may resume physical inspections as soon as practicable but must conduct an HQS inspection on these units no later than 6/30/2022.

### **3.03.04 Program Incentives**

To facilitate occupancy once vouchers are issued, CRHA intends to offer the following:

- i. Pre-inspections – CRHA or its designated agent will provide inspectors to perform pre-inspection of units to ensure they qualify for the program in advance of voucher issuance if unit is vacant and staff are available.
- ii. Higher Payment Standard – CRHA may establish a payment standard for each EHV unit size at payment standards higher than its current HCV standard for that county; this payment standard may be adjusted at CRHA’s discretion depending on actual and projected HAP spending, and rent must still be determined reasonable.
- iii. Incentive Payment to Landlord – CRHA will pay a landlord bonus of one-month’s rent at the time of lease signing, this only applies for new landlords has never been a previous or current vendor with HCV Program.
- iv. Tenant Stipend – CRHA will provide up to \$1,000 to reimburse tenants for moving and housing search expenses. This will include but is not limited to purchase of necessary furniture, bedding, home appliances or hook-ups; cost of transportation to secure housing; payment of any prior utility arrears; moving costs; other costs mutually agreed upon by the CoC and CRHA. The CoC will review and approve these expenses on CRHA’s behalf. CRHA will provide reimbursements to the CoC of Stipend Payments to be provided to the household by the CoC. The CoC is permitted to advance funds to households where necessary and be re-imbursed by CRHA.
- v. Repair Fund – CRHA will provide up to \$1,000 to reimburse the landlord for repairs necessary to ensure the health and safety of the tenant; expenses will be approved by the inspector for CRHA or its designated agent.
- vi. Security Deposit – CRHA will provide the security deposit for the household.
- vii. Landlord Guarantee – Should the landlord be forced to evict the tenant for non-payment of the tenant share of rent, CRHA will reimburse the landlord for losses accrued prior to the date of eviction within the first 12 months.

CRHA reserves the right to adjust these incentives as necessary. All incentives are contingent upon availability of federal Section 8 funds.

### **3.03.05 Definitions**

The following program definitions apply only to the Emergency Housing Voucher Program (EHV) for eligibility determination:

#### **A. Individuals and families who are homeless**

The meaning of “homeless” is as such term is defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)), which is codified in HUD’s Continuum of Care Program regulations at 24 CFR 578.3 and reads as follows:

Homeless means:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - (i) An individual or family with a primary nighttime residence that is a public or private place not

designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith based or other social networks, needed to obtain other permanent housing.

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

## **B. Individuals or families who are at-risk of homelessness**

The meaning of “at-risk of homelessness” is as such term is defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)), which is codified in HUD’s



Continuum of Care Program regulations at 24 CFR 578.3 and reads as follows:

*At risk of homelessness. (1) An individual or family who:*

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition above; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

### **C. Individuals or families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking**

This category is composed of any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This includes

cases where a HUD-assisted tenant reasonably believes that there is a threat of imminent harm from further violence if they remain within the same dwelling unit, or in the case of sexual assault, the HUD-assisted tenant reasonably believes there is a threat of imminent harm from further violence if they remain within the same dwelling unit that they are currently occupying, or the sexual assault occurred on the premise during the 90-day period preceding the date of the request for transfer.

**Domestic violence** includes felony or misdemeanor crimes of violence committed by:

- a. a current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship),
- b. a person with whom the victim shares a child in common,
- c. a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- d. a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or
- e. any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

**Dating violence** means violence committed by a person:

- a. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- b. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  1. The length of the relationship;
  2. The type of relationship; and
  3. The frequency of interaction between the persons involved in the relationship.

**Sexual assault** means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person’s individual safety or the safety of others; or
- (2) Suffer substantial emotional distress.

**Human trafficking** includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. § 7102). These are defined as:

*Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; (and)

*Labor trafficking* means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

## **D. Individuals or families who are recently homeless**

This category is composed of individuals and families determined by the CoC or its designee to meet the following definition.

***Recently homeless*** is defined as individuals and families who have previously been classified by a member agency of the CoC as homeless but are not currently homeless as a result of homeless assistance (financial assistance or services), temporary rental assistance or some type of other assistance, and where the CoC or its designee determines that the loss of such assistance would result in a return to homelessness or the family having a high risk of housing instability. Examples of households that may be defined as recently homeless by the CoC include, but are not limited to, participants in rapid rehousing, and permanent supportive housing.

## **E. Chronically Homeless**

This category is composed of individuals and families determined by the CoC or its designee to meet the following definition.

**(a)** A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- i.** lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii.** Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

**(b)** An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;

**(c)** A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2. (a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

## **Continuum of Care (CoC)**

The Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The CoC program promotes a communitywide commitment to the goal of ending homelessness. It provides funding for efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness. It also promotes access to and effects utilization of mainstream programs by homeless individuals and families. And optimizes self-sufficiency among individuals and families experiencing homelessness.

## **Victim Service Provider (VSP)**

A victim service provider is a private nonprofit organization whose primary mission is to provide direct services to victims of domestic violence. This term includes permanent housing providers—including rapid re-housing, domestic violence programs (shelters and non-residential), domestic violence transitional housing programs, dual domestic violence, and sexual assault programs, and related advocacy and supportive services programs.

## **Coordinated Entry (CE)**

The CE System is a centralized process designed to coordinate program participant intake assessment and provision of referrals. Each partnering agency will refer eligible EHV families directly from the CE System or HMIS.

## **PART VI: USE OF FUNDS, REPORTING, AND FINANCIAL RECORDS**

EHV funds allocated to the PHA for HAP (both funding for the initial allocation and HAP renewal funding) may only be used for eligible EHV HAP purposes. EHV HAP funding obligated to the PHA may not be used for EHV administrative expenses or the other EHV eligible expenses under this notice. Likewise, EHV administrative fees and funding obligated to the PHA are to be used for those purposes and must not be used for HAP.

The appropriated funds for EHV are separate from the regular HCV program and may not be used for the regular HCV program but may only be expended for EHV eligible purposes. EHV HAP funds may not roll into the regular HCV restricted net position (RNP) and must be tracked and accounted for separately as EHV RNP. EHV administrative fees and funding for other eligible expenses permitted by Notice PIH 2021-15 may only be used in support of the EHV and cannot be used for regular HCVs. EHV funding may not be used for the repayment of debts, or any amounts owed to HUD by HUD program participants including, but not limited to, those resulting from Office of Inspector General (OIG), Quality Assurance Division (QAD), or other monitoring review findings.

CRHA must comply with EHV reporting requirements in the Voucher Management System (VMS) and Financial Data Schedule (FDS) as outlined in Notice PIH 2021-15.

CRHA must maintain complete and accurate accounts and other records for the program and provide HUD and the Comptroller General of the United States full and free access to all accounts and records that are pertinent to the administration of the EHV in accordance with the HCV program requirements at 24 CFR 982.158.