

ACOP

ADMISSIONS AND CONTINUED
OCCUPANCY PLAN
UPDATED 2020

REVIEW FOR THE BOARD OF COMMISSIONERS

UPDATING THE ACOP: WHY & HOW

- Updated and formatted using Nan McKay ACOP Model
 - incorporating best practices and changes to reduce administrative burden where possible
- Added regulatory language – clearly shows PHA policies versus regulations
- Condensed from 28 chapters to 16
- Reviewed discretionary decisions with legal counsel
- Posted for public review on February 4, 2020 through March 27, 2020
- Presented to RAB on March 18, 2020
- Approval postponed from March meeting due to COVID-19 emergency

RECENT ACOP CHANGES PRIOR TO THIS UPDATE

- Pet Policy (Ch 10) updated in 2015
- Eligibility (ch 3) updated in 2017 – criminal background
- Fair Housing (Ch. 2) updated in 2019 – part of updating processes
- Over Income policy adapted in 2019 (in Ch 13)– per HUD requirement
- Applications (Ch4) updated in 2019 Online waiting list, two offer policy

SUMMARY OF SIGNIFICANT CHANGES

- **Timeframe for processes** – Standardizes deadlines for many processes at 14 business days
- **Eligibility** – Person over 18 who has not signed lease previously must have lived in unit for at least a year prior to taking over lease. PHA will determine suitability
- **Overnight guests** – Limited to 14 days per year (previously limited to 10 days at a time)
- **Late fees** – imposed the 16th rather than 20th of month to align with 15 day notice of unpaid rent
- **New family members (Ch 9)** – limits to additions other than birth, adoption or award of custody when it will require transfer to larger unit
- **Community Service**- Lowering work requirement from 30 to 20 hours to be exempt (this requirement is currently suspended due to a COVID waiver)
- **Transfers** – New high priority to those who have been waiting 5 years for a transfer (still below VAWA and emergencies).

OUTLINE OF NEW ACOP

Ch 1: Overview	Ch 2: Fair Housing & Equal Opportunity	Ch 3: Eligibility	Ch 4: Applications, Waitlist & Tenant Selection	Ch 5: Occupancy Standard & Unit Offers	Ch 6: Income & Rent
Ch 7: Verifications	Ch 8: Leasing and Inspections	Ch 9: Reexaminations	Ch 10: Pets	Ch 11: Community Service	Ch 12: Transfer Policy
	Ch 13: Lease Terminations	Ch 14: Grievances & Appeals	Ch 15: Program Integrity	Ch 16: Program Administration	

PUBLIC COMMENT

Comment:

- The ACOP revision rent collection policy change that establishes the date at which PHA assesses a late rent fee as the 16th of the month instead of the 21st day of the month.
- RAB members commented that many residents receive income twice per month on the 1st and 15th, and expressed concern that this new policy will result in many residents being late on their rent.

Response:

- PHA did a survey of other public housing agencies and found that many others institute late fees as soon as the 6th of the month, so our proposed new policy would continue to be more lenient than most.
- In addition, our \$10 late fee is lower than all other local PHAs we contacted.
- The change will help PHA operationally and reduce confusion by combining the late fee notice with the existing unpaid rent notice that is sent on the 16th.
- Residents receiving payments on the 15th by direct deposit would still be able to make a payment on time, and property managers will be able to waive late fees for good cause when appropriate.

******In light of COVID-19, PHA has implemented a rent repayment program and is offering one-on-one financial counseling for those who are behind on rent. We are not charging any late fees between April and July 2020.***

NEXT STEPS

- Revise lease to reflect changes in ACOP
- Train pertinent staff on changes
- Annually – bring mandatory and any new discretionary updates to board