Streamlined Annual PHA Plan ***(High Performer PHAs)***	**U.S. Department of Housing and Urban Development** **Office of Public and Indian Housing**	**OMB No. 2577-0226** **Expires: 03/31/2024**

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low-income families.

Applicability. The Form HUD-50075-HP is to be completed annually by High Performing PHAs. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

(1) High-Performer PHA – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
(2) Small PHA - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
(3) Housing Choice Voucher (HCV) Only PHA - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
(4) Standard PHA - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
(5) Troubled PHA - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
(6) Qualified PHA - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Grand Rapids Housing Commission (GRHC) **PHA Code**: MI073
PHA Type: ☒ High Performer
PHA Plan for Fiscal Year Beginning: July 1, 2025 (GRHC Fiscal Year 2026)
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units: 188 **Number of Housing Choice Vouchers (HCVs): 3,520**
Total Combined: 3,708
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

Locations where the public may view and/or obtain copies of the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan; the final PHA Plan documents will also be available at the locations below:
1. GRHC Administrative Office, 1420 Fuller Ave. SE, Grand Rapids, MI
2. GRHC web site: www.grhousing.org
3. GRHC asset management project offices:
   Adams Park Apartments, 1440 Fuller Ave. SE, Grand Rapids, MI
   Antoine Court Apartments, 901 Division Ave. S, Grand Rapids, MI
   Campau Commons Apartments, 821 Division Ave. S, Grand Rapids, MI
   Creston Plaza Apartments, 1080 Creston Plaza Dr. NE, Grand Rapids, MI
   Hope Community, 1024 Ionia SW, Grand Rapids, MI
   Leonard Terrace Apartments, 1315 Leonard St. NE, Grand Rapids, MI
   Mount Mercy Apartments, 1425 Bridge St. NW, Grand Rapids, MI
   Ransom Tower Apartments, 50 Ransom Ave. NE, Grand Rapids, MI
   Sheldon Apartments, 1010 Sheldon SE, Grand Rapids, MI

☐ **PHA Consortia:** (Check box if submitting a Joint PHA Plan and complete the table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Plan Elements

B.1 **Revision of Existing PHA Plan elements.**

(a) Have the following PHA Plan elements been revised by the PHA since its last **Annual PHA Plan** submission?

B.1 (cont.)

Y	N	
☒	☐	Statement of Housing Needs and Strategy for Addressing Housing Needs.
☒	☐	Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.
☒	☐	Financial Resources.
☒	☐	Rent Determination.
☒	☐	Homeownership Programs.
☒	☐	Safety and Crime Prevention.
☐	☒	Pet Policy.
☐	☒	Substantial Deviation.
☐	☒	Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each element below.

(c) The PHA must submit its Deconcentration Policy for Field Office Review.

The GRHC's Deconcentration Policy is provided as Attachment A.

Statement of Housing Needs and Strategy for Addressing Housing Needs

While the GRHC continues to use the City of Grand Rapids and Kent County Regional Consolidated Housing and Community Development Plan that runs through June 30, 2026, as a resource for understanding community needs, during 2024 our agency embarked on a strategic planning process for the next five years and has developed a 2025-2030 Five-Year Agency Plan that reflects our updated understanding of community housing and supportive needs (see submitted HUD form 50075-5Y). Additionally, we have amended our agency Mission statement and developed new Vision and Values statements:

Mission: We are committed to offering quality affordable housing, essential resources through advocacy and partnerships, and promoting self-sufficiency to strengthen communities.

Vision: To create communities where housing is affordable, opportunities are impactful and self-sufficiency is the goal.

Values: We create **HOMES** with:

Housing: We believe that everyone deserves a place to call home.
Open Communication: We share ideas in a collaborative setting by building trust through clear and consistent communication.
Mutual Respect: We honor and value each individual, fostering a culture where every voice is heard and respected.
Excellence: We strive for excellence in everything we do, promoting a culture of accountability and continuous growth.
Supportive Communities: We create communities that emphasize well-being and offer holistic support, motivating individuals and families to thrive.

Revisions to Policies that Govern Eligibility, Selection and Admissions

During 2024 the GRHC amended the Housing Choice Voucher (HCV) Administrative Plan Chapter 4, "Applications, Waiting List and Tenant Selection," Part III, "Selection for HCV Assistance," 4-III.C, "Selection Method" to provide a preference for referrals from an eviction prevention program; limited to 25 vouchers per year. The relevant section of Chapter 4 is included as Attachment B.

During 2025, following a public comment period, the GRHC will consider amending the Housing Choice Voucher (HCV) Administrative Plan Chapter 4, "Applications, Waiting List and Tenant Selection," Part III, "Selection for HCV Assistance," 4-III.C, "Selection Method" to remove a local preference for residents who are being displaced by government action and to raise the capacity limits of a preference for households experiencing homelessness and referred by the local Continuum of Care (CoC) from up to 25% of the annual attrition of the HCV Program to up to 33% of the annual attrition of the HCV Program. (Draft plan revision, 3-20-25)

During 2024 the GRHC amended the HCV Administrative Plan Chapter 7, "Verification," Part III, "Verifying Income and Assets," 7-III.F, "Assets and Income from Assets" to allow self-certification of assets up to $50,000. The relevant section of Chapter 7 is included as Attachment C.

During 2024, the GRHC amended the Admissions and Continued Occupancy Policy (ACOP) that governs our Low-Income Public Housing (LIPH) Program. Chapter 7, "Verification," Part 1, "General Verification Requirements," 7-I.I. Level I, "Non-Third-Party Verification Technique: Self-Certification," to allow self-certification of assets up to $50,000. The relevant section of ACOP Chapter 7 is included as Attachment D.

During 2024 the GRHC amended the HCV Administrative Plan Chapter 8, "Housing Quality Standards," to incorporate HUD's new "National Standards for the Physcial Inspection of Real Estate" (NSPIRE) inspection standards. The amended Chapter 8 is included as Attachment E.

During 2024 the GRHC amended the HCV Administrative Plan Chapter 17, "Project-Based Vouchers," Part 17-II.D, "Prohibition of Assistance for Certain Units," to permit the attachment of Project-Based Vouchers to shared housing and manufactured homes. The relevant section of Chapter 17 is included as Attachment F.

During 2024 the GRHC amended the HCV Administrative Plan Chapter 19, "Special Purpose Vouchers," Part III, "Veterans Affairs Supportive Housing (VASH) Program," to incorporate additional rules and flexibilities as described in the August 13, 2024, Federal Register notice, including changes to family eligibility, income verification, portability and case management requirements. The relevant Chapter 19 section is included as Attachment G.

During 2024 the GRHC amended the HCV Administrative Plan Chapter 19, "Special Purpose Vouchers," Part IV, "Mainstream Voucher Program," to incorporate the new regulatory guicance in PIH Notice 2024-30, which requires extending the initial unit search period to 120 days, providing flexible extensions of voucher terms and opening a separate waiting list for Mainstream Vouchers. The relevant Chapter 19 section is included as Attachment H.

B.1 (cont.)

Revisions to Policies that Govern Eligibility, Selection and Admissions (continued)

During 2024 the GRHC amended the HCV Administrative Plan Chapter 20, "Moving to Work," Part II, "MTW Waivers," 1.II.B, "GRHC Selected Waivers," to allow a subsidy to a third party thorugh an RFP process to provide housing services to citizens returning from incarceration. Chapter 20 is included as Attachment I.

Details of waiver implementation are provided within the 2025 Moving to Work (MTW) Supplement provided as Attachment J.

Financial Resources

In November 2024 the GRHC made 15 LIPH Scattered Sites single-family homeownership units available for sale through the Section 18-Scattered Sites Asset Repositioning initiative; see Section B.2 of this plan for details. Funds from these sales will be used for development, acquisition, rehab and preservation activities.

Current allocations of Capital Funds allotted to GRHC are outlined in the Capital Fund Program Five-Year Action Plan approved on July 17, 2024 (available in the HUD Energy and Performance Information Center (EPIC) Secure System). The GRHC is in the process of planning and implementing an asset repositioning strategy for our remaining Low-Income Public Housing (LIPH) units. Depending on the repositioning option selected by GRHC, future Operating Funds and Capital Funds may be impacted; if a RAD Section 18 Blend is chosen, there would be some circumstances that would allow us to retain some Public Housing funds.

For more information about the GRHC's financial resources, please reference the Proposed Operating Budget for the fiscal year ending 6/30/25 included as Attachment K.

During 2024 the GRHC implemented funding flexibilities as permitted under the MTW designation and waivers that impacted financial resources due to administrative process changes (savings) and funding landlord incentives and resident support initiatives (outlays). Specific waivers are summarized below.

Landlord Leasing Incentives:

a. Vacancy Loss (HCV - Tenant-Based Assistance). To incentivize a landlord's continued participation in the HCV program, the agency makes a vacancy loss payment equal to one month's contract rent available to the landlord..
b. Other Landlord Incentives (HCV - Tenant-Based Assistance). In order to encourage landlord retention and incentivize new landlords to join the HCV program, the GRHC offers a Landlord Incentive Program. The GRHC may target incentive payments to landlords leasing properties in high-opportunity neighborhoods or in areas where vouchers are difficult to use as defined in our Administrative Plan.

Housing Barrier Fund

During 2024 the GRHC established a fund that provides direct assistance to GRHC program participants and applicants, helping applicants and assisted families overcome such barriers as paying for rental application fees, security deposits and prior utility charges.

Returning Citizens Initiative

If funding permits, during 2025 the GRHC plans to implement a new Local Nontraditional Activity that will provide a subsidy to a third party through an RFP process to provide housing services to citizens returning from incarceration.

Continuum of Care Grant for Antoine Court Apartments:

During October 2024 the GRHC applied to receive a $79,832 Continuum of Care grant that would fund case management services for the residents of Antoine Court Apartments who are eligible for Permanent Supportive Housing (PSH).

A summary of current and planned waiver implementation is provided within the 2025 MTW Supplement provided as Attachment J.

Revisions to Policies that Govern Rent Determination

During 2024 the GRHC amended our LIPH ACOP, Chapter 9, "Reexaminations, Part I, "Annual Reexaminations for Families Paying Income-Based Rents" to decrease the frequency of reexaminations from annual to biennial for all assisted households. The relevant section of Chapter 9 is included here as Attachment L.

During 2024 the GRHC amended the Admissions and Continued Occupancy Policy (ACOP) that governs our LIPH Program. Chapter 9, "Reexaminations," Part III, "Interim Reexaminations" to limit Interim Recertifications related to decreases of income to decreases that are greater than 10 percent of the family's/household's gross annual income and/or household composition changes. Residents can request a hardship exemption to waive this MTW activity. The relevant section of Chapter 9 is included here as Attachment M.

During 2024 the GRHC amended our HCV Administrative Plan, Chapter 11, "Reexaminations," Part I, "Annual Reexaminations," 11-1.B, "Scheduling Annual Reexaminations," to permit alternative reexamination schedules for households. The GRHC has decreased the frequency of recertifications from annual to biennial. The relevant section of Chapter 11 is included here as Attachment N.

During early 2025 the GRHC's HCV Administrative Plan Chapter 11, "Reexaminations," Part 1, "Annual Reexaminations," 11-I.B, "Scheduling Annual Reexaminations," was amended to change the frequency of reexaminations from annual to biennial for all families in the HCV Program.

B.1 (cont.)

Effective January 1, 2025, the GRHC adopted Voucher Payment Standards (VPS) that are 110 percent of the HUD-established Kent County Fair Market Rents (FMRs) for Federal Fiscal Year 2025. Effective February 1, 2025, the GRHC updated the Kent County utility allowances used in the Section 8 Housing Choice Voucher and Low-Income Public Housing programs in compliance with 24 CFR part 982.517. Current VPS and utility allowance schedules are included in Attachment O.

Effective January 1, 2025, the GRHC adopted Voucher Payment Standards (VPS) that are 110 percent of the HUD-established Ottawa County Fair Market Rents (FMRs) for 0- to 3-bedroom units and 105 percent of FMRs for 4- to 6-bedroom units for Federal Fiscal Year 2025. Effective February 1, 2025, the GRHC updated the Ottawa County utility allowances used in the Section 8 Housing Choice Voucher Program in compliance with 24 CFR part 982.517. Current VPS and utility allowance schedules are included in Attachment O.

Effective January 1, 2025, the GRHC adopted flat rents that are 80 percent of the HUD-established Kent County Fair Market Rents (FMRs) for Federal Fiscal Year 2025 for residents of Adams Park Apartments (MI073000001), our sole Low-Income Public Housing property. FY 2025 flat rents are included in Attachment O.

B.2

New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year:

Y	N	
☒	☐	Hope VI or Choice Neighborhoods.
☒	☐	Mixed Finance Modernization or Development.
☒	☐	Demolition and/or Disposition.
☒	☐	Conversion of Public Housing to Tenant Based Assistance.
☒	☐	Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
☒	☐	Project-Based Vouchers.
☒	☐	Units with Approved Vacancies for Modernization.
☒	☐	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Adams Park Apartments (MI073000001), 188 units:

The Grand Rapids Housing Commission (GRHC) is moving forward with plans to redevelop Adams Park Apartments, located at 1440 Fuller Ave. SE. A 2021 inspection showed that major building systems, including plumbing and electrical located beneath the structure, cannot be replaced if they fail. Because of this, a renovation is not financially or physically feasible, and the GRHC has determined that full redevelopment is necessary.

The GRHC will submit a Section 18 Demolition/Disposition application for Adams Park Apartments. This application, required by the U.S. Department of Housing and Urban Development (HUD), would authorize the GRHC to remove the property from its public housing inventory and begin the process of redevelopment. If approved, this step allows GRHC to pursue new funding sources, such as Low-Income Housing Tax Credits, and HUD grants, to support the long-term redevelopment of Adams Park.

Additionally, if approved, all Adams Park residents will be required to relocate. The GRHC will implement a relocation plan in full compliance with HUD requirements to ensure that residents are supported throughout the process. Assistance will include Tenant Protection Vouchers (TPVs), advisory services, and help identifying and securing comparable housing. The GRHC is committed to minimizing disruption during this transition and will maintain open communication with residents to provide timely updates and guidance. As part of this process, the GRHC will also utilize transference of assistance and Restore Rebuild strategies to leverage other developments in order to support relocation needs and the creation of new affordable housing opportunities.

Hope Community Rapid Re-Housing Program, 24 units:

The GRHC continues to seek public and private funding and in-kind donations to support a $2.4 million renovation of our Hope Community Rapid Re-Housing program facilities. The GRHC may elect to seek funding through the LIHTC and/or Choice Neighborhoods programs.

During March 2023 the GRHC was awarded a $500,000 HOME-ARP Grant from the City of Grand Rapids in support of renovations at the Hope Community Service Center; needed repairs and improvements funded under this grant will be completed by April 30, 2025.

Hope Community includes 24 units located at 1024 Ionia Avenue SW (12 units), 34/38 Albany St. SW (2 units), 35/37 Shelby St. SW (2 units), 43/47 Canton St. SW (2 units), 106/108 Putnam St. SW (2 units), 1043/1045 Ionia Ave. SW (2 units), and 1106/1108 Ionia Ave. SW (2 units).

B.2 (cont.)

Hope Community serves families experiencing homelessness; we will continue to serve this population after renovation. Bedroom distribution at Hope Community is (and will remain):

- 12 modular units.
- Two-bedroom duplex units (6 units).
- Three-bedroom duplex units (6 units).

Tenant relocation for the renovations currently being completed required one- to five-day stays at an extended-stay hotel for some units; all applicable assistance available through the Uniform Relocation Act was provided.

The redevelopment of Adams Park and renovation of Hope Community support the following 2020-2024 Five-Year Plan goals:
Community Planning: "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families."
Maintenance: "Maintain the Housing Commission real estate in good condition."

Scattered Sites (MI073000004), 15 units:

The GRHC has administered 15 single-family LIPH Scattered Sites units that were included in an existing homeownership program. During July 2024 the GRHC received HUD approval to dispose of these units through a Section 18-Scattered Sites Asset Repositioning initiative. Informational meetings for affected residents were held in August 2024; residents received the first right of purchase for these homes, followed by other GRHC program participants, then residents of Kent or Ottawa County whose household income did not exceed 80 percent of Area Median Income. Eligible affected residents received relocation assistance as well as Tenant Protection Vouchers to help them relocate to affordable housing suited to each family's needs; all tenants will be relocated by 6/30/25. One tenant chose to purchase the home they occupied at Fair Market Value (3-bedroom unit at 1128 Fisk St SE).

The GRHC made six of the remaining homes available at Fair Market Value (FMV) to eligible GRHC program participants and other income-eligible Kent and Ottawa County households. Buyers have closed on the following homes (all 3-bedroom units):

2125 Francis Ave. SE	442/424 Griggs St. SE	1127 Kalamazoo Ave. SE

The following 3-bedroom homes are on the market as of 4/15/25:

442 Adams St. SE	2144 Horton Ave. SE	808 Woolsey Dr. SW

With the goal of ensuring the long-term affordability of the disposed units, during December 2024 the GRHC finalized an agreement with community partner ICCF Community Homes (ICCF) whereby the organization would purchase eight homes for less than Fair Market Value at a total purchase price of $739,500; all homes will be incorporated into existing ICCF affordable housing and homeownership programs, and the agreement also includes a deed restriction that ensures all homes will remain affordable for a period of 30 years. Units purchased by ICCF are:
(All homes have three bedrooms with the exception of 716 Thomas St. SE, which has four bedrooms.)

448 Oakdale St. SE	465 Oakdale St. SE	650 Henry Ave. SE	21 Shelby St. SE
461 Oakdale St. SE	500 Crawford St. SE	716 Thomas St. SE	831 Bates St. SE

The conversion of these Scattered Sites units supports the following specific goals in our 2020-2024 Five-Year PHA Plan:
Maintenance: "Maintain the Housing Commission real estate in good condition."
Community Planning: "Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families."

Project-Based Voucher Program

As noted in the "Financial Resources" section above, the GRHC is in the process of finalizing the purchase of 12 residential family units at Madison and Hall on Grand Rapids' southeast side that will be administered as part of the GRHC's Project-Based Voucher Program.

In an effort to expand the inventory of affordable housing in Kent and Ottawa counties, during the past year the GRHC awarded a total of 92 Project-Based Vouchers (PBVs) to a number of organizations in support of their development efforts:

- 4 additional PBVs were awarded to ICCF Community Homes in support of 1309 Madison Apartments, 45 units of new construction serving households with incomes between 30-80 percent of Area Median Income (AMI); the development had previously been awarded 16 vouchers.
- 7 PBVs were awarded to ICCF Community Homes in support of 2017 Eastern Avenue, a mixed-use development that includes 16 apartments for households with income between 45-100 percent of AMI.
- 10 PBVs were awarded to Volker Development Inc. in support of Alpine Senior Apartments, a 52-unit development on Grand Rapids' northwest side that will serve ages 55 and older, with household income not exceeding 70 percent of AMI.
- 7 PBVs were awarded to AYA Youth Collective in support of the organization's AYA Youth Collective Housing Initiative, which offers affordable rental housing to youth ages 18-24 who are experiencing homelessness or are at risk for experiencing homelessness. Residents have a private room, and an older mentor lives nearby to help the young people navigate living on their own.
- 7 PBVs were awarded to New Development Corporation in support of Carrier Crest Apartments, a 12-unit development that offers studio and one-bedroom units to low-income seniors ages 55 and older as well as adults with disabilities.
- 8 PBVs were awarded to Reenders Inc. in support of a 77-unit apartment complex in Grand Haven to be operated by Gracious Grounds, a nonprofit organization that provides affordable housing and supportive services to individuals with intellectual disabilities.

B.2 (cont.)

- 6 PBVs were awarded to Mel Trotter Ministries in support of Hope Village, a 16-unit "tiny home" community on Grand Rapids' southeast side that will be available to individuals experiencing homelessness, individuals who have completed a Mel Trotter or Next Step work force development program, and those who who secured sustainable employment that is at or below 65 percent of AMI.
- 8 PBVs were awarded to Rennovare Development LLC in support of a plan to convert a church-owned funeral home on Grand Rapids southeast side into up to 70 units of housing, including market-rate and affordable units.
- 10 PBVs were awarded to Well House in support of a "Scaling to Sustainability" initiative that supports the organization's mission of providing permanent low-cost housing to vulnerable populations experiencing chronic homelessness. The initiative will develop nine new housing units that will house up to 35 individuals.
- 20 PBVs were awarded to East Fulton Units Foundation in support of the conversion of a vacant retirement home on Grand Rapids east side into 40 units of housing for people experiencing homelessness. The new Carlton Lofts will house The Nexus Initiative, a Community Rebuilders program that will provide supportive services to residents.
- 5 PBVs were awarded to LINC Up in support of Uptown Village, a 24-unit affordable rental housing development located at 950 Wealthy St. SE in Grand Rapids.

The recent PBV awards support the following specific Community Planning goals in our 2020-2024 Five-Year Plan:

- Goal: Expand the role of the GRHC in community planning, particularly planning related to affordable housing opportunities.
  - Objective: Continue to seek and develop new avenues for providing affordable housing opportunities to our community's growing senior population, in particular programs and services that enhance senior citizens' ability to live independently and maintain quality of life.
- Goal: Address a community need cited in the Kent County, City of Grand Rapids and City of Wyoming Regional Consolidated Housing and Community Development Plan by making affordable housing opportunities more available to low-income and very low-income families.

Capital Grant Programs

During 2022 the GRHC was designated as a MTW agency and modified its CFP budgets and activities to reflect the MTW BLI of 1492. GRHC will continue to implement funding flexibilities for CFP funds as permitted by the MTW program. Activities planned for the year ahead are outlined in the MTW supplement included as Attachment J.

B.3

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals in the PHA 5-Year Plan.

The Grand Rapids Housing Commission continues to make significant progress toward accomplishing its stated mission of offering quality affordable housing, essential resources through advocacy and partnerships, and promoting self-sufficiency to strengthen communities.

Some of the most significant accomplishments of the past year follow; these support Five-Year Plan voucher program, community planning, maintenance, equal opportunity and resident services goals.

- Renewed a Memorandum of Understanding with the Ottawa County Housing Commission to ensure enhanced communication and continuing coordination to maximize housing opportunities in Ottawa County.
- Expanded the GRHC Landlord Incentive Program to add a referral bonus available to HCV Program landlords who refer new landlords and a vacancy loss payment equal to one month's rent to landlords currently leasing to GRHC program participants and willing to lease to additional participants.
- Offered several Landlord Forum events to update landlord partners regarding our HCV Program as well as an early January 2025 NSPIRE training designed specifically for our landlord partners.
- Promoted housing access in our service area by awarding 92 Project-Based Vouchers in support of partner organizations' affordable housing development efforts.
- Continued our Moving to Work "Aim to Save" resident asset building program, helping 37 adult program participants and 35 of their children ages 13-18 build personal savings. As of 1/31/25, the GRHC has deposited $38,940 into participant accounts, plus matching funds of $5,657. The Aim to Save accounts have so far accrued $479 in interest.
- Continued to administer a Family Self-Sufficiency (FSS) Program, serving more than 200 households during 2024. The FSS Program helps participants accrue funds in an escrow account based on increases in earned income. During 2024 the program disbursed a total of $207,864 to 26 program graduates.
- Continued to partner with Wyoming Housing Commission and Kent County Community Action to offer quarterly HCV Homeownership Program orientation meetings; 122 households attended an orientation meeting during 2024, and one family closed on a home.
- Utilized our Emergency Housing Vouchers at 110 percent, currently supporting 46 households experiencing homelessness, at risk of housing instability or fleeing domestic violence.
- Administered 32 vouchers through the GRHC's Foster Youth to Independence (FYI) program, which provides a rental subsidy and optional supportive services to youth who are aging out of the foster care system.
- Worked with community partners to host several resident/community engagement events to get input that will shape our Adams Park Apartments redevelopment plan; Adams Park serves adults with disabilities and seniors ages 62 and older.
- Identified and are in the process of finalizing the purchase of 12 additional units of PBV Program housing that will support a Choice Neighborhoods Program initiative that also incorporates Adams Park redevelopment.
- In the process of completing the sale of 15 LIPH homeownership units through the Section 18 - Scattered Sites Program, with funds slated for the rehabilitation of existing units as well as the acquisition of new properties.
- Partnered with HUD and Job Corps to forge an innovative partnership that brings housing, financial literacy and other self-sufficiency-related resources to students of Grand Rapids' Gerald R. Ford Job Corps Center.
- Worked with partner organizations to provide GRHC residents with a wide range of supportive services, including health information and screening, community resource fairs, educational presentations, social opportunities, and food and transportation resources.
- Conducted a strategic planning process to assess the local housing environment and gather input to inform the GRHC Five-Year Plan.
- Partnered with the Grand Rapids Area Coalition to End Homelessness, City of Grand Rapids and Kent County leadership, United Way and other organizations, businesses and volunteers in a "100 in 100 Kent County" campaign that has the goal of finding permanent housing for 100 unhoused individuals in 100 days, with a focus on people experiencing chronic homelessness. The GRHC has a crucial role in this effort, providing 30 housing vouchers as well as agency-owned housing units.
- Undertook a process-mapping project designed to improve operational efficiency.

B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. Anticipated capital expenditures for the fiscal year that begins 7/1/2025 are included in the Capital Fund Program Five-Year Action Plan approved on July 17, 2024, (available in the HUD Energy and Performance Information Center (EPIC) Secure System).
B.5	**Most Recent Fiscal Year Audit.** (a) Were there any findings in the most recent FY Audit? Y N ☒ ☐ Fiscal Year ended 6/30/24 (b) If yes, please describe Auditors identified one finding related to income calculations. Findings and the GRHC Corrective Action Plan are included as Attachment P.
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) provide comments to the PHA Plan? Y N ☒ ☐ A Resident Advisory Board meeting was held on 3/20/25. The meeting agenda and minutes are included as Attachment Q.
C.2	**Certification by State or Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic statement to the PHA Plan. Included as Attachment R.
C.3	**Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan** Form 50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed must be submitted by the PHA as an electronic attachment to the PHA Plan.* Included as Attachment S.
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the PHA Plan? Y N ☐ ☒ There were no challenged elements.
C.4 (cont.)	If yes, include Challenged Elements.
D.	**Affirmatively Furthering Fair Housing (AFFH).**

D.1 **Affirmatively Furthering Fair Housing.**

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

The GRHC awaits further HUD guidance concerning submission of the Assessment of Fair Housing (AFH).

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

ATTACHMENT A

Adams Park Development – Deconcentration and Income-Mixing Policy

The Grand Rapids Housing Commission (GRHC) is committed to promoting access to adequate, affordable housing, economic opportunity, and a suitable living environment free from discrimination. Tenant selection and assignment for the Adams Park Development—a general population community consisting of 188 units—will be conducted in accordance with all applicable fair housing and civil rights laws. No individual shall be discriminated against based on race, color, religion, national origin, sex, familial status, disability, marital status, age, or HIV status.

To enhance community vitality and promote diverse, inclusive neighborhoods, GRHC will implement policies designed to support the deconcentration of poverty and income-mixing at Adams Park. These efforts include:

- Encouraging higher-income households to reside in traditionally lower-income developments and vice versa.
- Supporting initiatives that help raise the incomes of current residents in public housing.
- Ensuring all measures to accomplish these goals are applied fairly and uniformly.

Income Considerations and Waiting List Management

Gross annual income will be used to determine income eligibility at the time of admission and for the purposes of income-mixing. In some cases, families on the waiting list may be "skipped" to reach applicants whose admission would support deconcentration goals. This is not considered an adverse action and will be applied consistently until the established income balance is achieved.

Annual Review and Project Designation

GRHC will collect and analyze tenant income data annually for Adams Park to monitor income distribution and inform deconcentration efforts. Based on this analysis, projects may be designated as either higher or lower income communities to guide admissions and assignment strategies.

If significant shifts in tenant incomes are observed, GRHC will reassess project designations to determine whether changes are needed to align with income-mixing goals. If the desired income distribution has been achieved, no specific designation may be applied.

Goals and Long-Term Commitment

GRHC's approach to deconcentration and income-mixing is a long-term, incremental strategy. While specific quotas will not be set, GRHC will establish benchmarks based on annual analysis.

Unit Assignment and Transfers

When selecting applicants or approving transfers for Adams Park, GRHC will consider whether the household supports the broader deconcentration objectives. However, in situations where there are not enough eligible applicants to meet these goals, GRHC will not allow units to remain vacant unnecessarily.

GRAND RAPIDS HOUSING COMMISSION
HOUSING CHOICE VOUCHER
DECONCENTRATION POLICY

Purpose

The purpose of the Grand Rapids Housing Commission's Deconcentration Policy is to establish a framework for staff to follow in order to ensure compliance with the requirements to expand housing opportunities as detailed in 24 CFR 982.54, 24 CFR 982.301, and the Housing Commission's Housing Choice Voucher Administrative Plan.

Overview

Public Housing Authorities (PHAs) are responsible for ensuring that very-low income households have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to enlist a sufficient number of landlords, representing all types and ranges of affordable housing in the PHA's jurisdiction, to participate in the Housing Choice Voucher program and provide information to program participants about this initiative.

Implementation – Landlords

The Grand Housing Commission (GRHC) will conduct regular landlord outreach events to encourage property owners outside of areas of poverty and/or minority concentration to lease units to Housing Choice Voucher (HCV) participants. Educational information will be provided to familiarize owners with the program and how they benefit from participation.
These outreach strategies will include:

- Distributing printed materials about the program to property owners and managers,
- Contacting property owners and managers by phone or in person,
- Holding owner recruitment/information meetings at least once a year,
- Participating in community-based organizations comprised of private property and apartment owners and managers, and
- Developing working relationships with property owners and apartment managers.

Implementation – Participants

The GRHC will affirmatively inform participants of our jurisdiction coverage area at all orientations and/or interviews. HCV participants will not be steered towards specific landlords or areas. Participants will receive information regarding the entire jurisdiction coverage area of the GRHC, be advised of the HUD deconcentration initiatives, provided information which reflects areas of deconcentration, and encouraged to make informed housing decisions.

ATTACHMENT B

EXCERPT, HCV ADMINISTRATIVE PLAN CHAPTER 4
APPLICATIONS, WAITING LIST & TENANT SELECTION

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list will be selected for assistance in accordance with the policies described in this part.

The GRHC will maintain a clear record of all information required to verify that the family is selected from the waiting list according to the GRHC's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing). In these cases, the GRHC will admit such families whether they are on the waiting list, and, if they are on the waiting list, without considering the family's position on the waiting list. These families are considered non-waiting list selections. The GRHC will maintain records showing that such families were admitted with special program funding.

Targeted Funding [24 CFR 982.204(e)]

HUD may award the GRHC funding for a specified category of families on the waiting list. The GRHC will use this funding only to assist the families within the specified category. In order to assist families within a targeted funding category, the GRHC will skip families that do not qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

The GRHC administers the following types of targeted funding:

- Non-Elderly Disabled (NED)
- Veterans Affairs Supportive Housing (VASH)
- Mainstream
- Emergency Housing Vouchers (EHV)
- Foster Youth to Independence (FYI)

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

Local Preferences [24 CFR 982.207; HCV p. 4-16]

GRHC will use the following local preferences, in this order:

1. The GRHC will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.

2. The GRHC will offer a preference to residents that are being displaced by government action.
3. The GRHC will offer a preference to Hope Community's Rapid Re-Housing Program (for homeless families) participants.
4. The GRHC will provide a preference to Homeless Households that are referred by the local Continuum of Care (CoC) limited to 25% of the annual attrition of the HCV program.
5. The GRHC will provide a preference for referrals from an Eviction Prevention Program limited to 25 vouchers per year.
6. The GRHC will provide a preference for funding awarded by HUD within a specified category (mainstream and NED).
7. The GRHC will offer a preference to GRHC Project Based families who become eligible, and/or are in need of a barrier free unit(s).
8. The GRHC will offer a preference to residents that are in Kent County and Ottawa County, Michigan.
9. The GRHC will offer a preference to residents that are Veterans with honorable discharge status and/or a surviving spouse of a Veteran.

The GRHC will offer preference to participant households with more than one family member(s), selection will be based on date and time of application. For single person household(s), persons who are elderly, disabled or handicapped will be selected before other single person households.

Mainstream Vouchers

The GRHC will offer a preference to non-elderly persons with disabilities. The GRHC will maintain one waiting list for all tenant-based assistance, which includes Mainstream voucher assistance. When issuing a Mainstream Voucher, the GRHC will choose the Mainstream-eligible family from its tenant-based waiting list, first. When all Mainstream-eligible families are served from the GRHC main waiting list, the GRHC will accept referrals through established partnering service agencies that are identified by Memorandums of Understanding (MOU's), who are seeking to house Mainstream-eligible families.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the GRHC's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, the GRHC may skip non-ELI families on the waiting list in order to select an ELI family. Low-income families

admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

GRHC MTW Flexibility

GRHC will monitor progress in meeting the income targeting requirement throughout the fiscal year. Very low-income (50% of AMI) families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

The GRHC system of preferences will select families based on local preferences or targeted funding according to the date and time of application or by a random selection process (lottery) [24 CFR 982.207(c)].

If the GHRC does not have enough funding to assist the family at the top of the waiting list, it is not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

Documentation will be maintained by the GRHC as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the GRHC does not have to ask higher placed families each time targeted selections are made.

4-III.D. NOTIFICATION OF SELECTION [24 CFR 982.554(A)]

GRHC will notify the family via email and/or mail when it is selected from the waiting list. The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview
- Who is required to attend the interview
- All documents that must be provided at the interview, including information about what constitutes acceptable documentation

If a notification letter is returned to GRHC with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.

4-III.E. THE APPLICATION INTERVIEW

Families selected from the waiting list are required to participate in an eligibility interview. Being invited to attend an interview does not constitute admission to the program.

The head of household and the spouse/cohead will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/cohead may attend the interview on behalf of the family. Verification of information pertaining to adult members of the household

not present at the interview will not begin until signed release forms are returned to the GRHC.

The head of household or spouse/cohead must provide acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity.) If the family representative does not provide the required documentation at the time of the interview, he or she will be required to provide it within 15 calendar days.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 21 calendar days. If not all household members have disclosed their SSNs at the next time GRHC is issuing vouchers, the GRHC will issue a voucher to the next eligible applicant family on the waiting list.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, and must complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the GRHC will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 15 calendar days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the GRHC will provide translation services at the applicants' request.

If the family is unable to attend a scheduled interview, the family should contact the GRHC in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the GRHC will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without GRHC approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.

4-III.F. COMPLETING THE APPLICATION PROCESS

The GRHC will verify all information provided by the family (see Chapter 7). Based on verified information, the GRHC will make a final determination of eligibility (see Chapter 3) and will confirm that the family qualified for any special admission, targeted funding admission, or selection preference that affected the order in which the family was selected from the waiting list.

If the GRHC determines that the family is ineligible, the GRHC will send written notification of the ineligibility determination within 15 calendar days of the determination. The notice will

specify the reasons for ineligibility, and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list. The GRHC will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

If the GRHC determines that the family is eligible to receive assistance, the GRHC will invite the family to attend a briefing in accordance with the policies in Chapter 5.

PART III: VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this plan describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides GRHC policies that supplement the general verification procedures specified in Part I of this chapter.

7-III.A. EARNED INCOME

Unless tip income is included in a family member's W-2 by the employer or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year and tips anticipated to be received in the coming year.

Wages

When the GRHC requires third-party verification of wages, for wages other than tips, the family must provide two most current (within 60 calendar days), consecutive pay stubs.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

The GRHC will obtain written, third-party verification when the income type is not available in EIV. This includes income from self-employment.

Business owners and self-employed persons will be required to provide:

- Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.).
- If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

For self-employed individuals who claim they do not to file tax returns, The GRHC will obtain a completed copy of IRS Form 4506-T to verify that no return has been filed.

For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the GRHC will provide a format for the individual to declare their income and expenses. The GRHC will also review the printed statement of monthly income from the applicable app for all hours worked and pay received as well as the Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.

The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the GRHC may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the GRHC will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the GRHC will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 11.

Social Security/SSI Benefits [Notice PIH 2023-27]

Verification requirements for Social Security (SS) and Supplemental Security Income (SSI) benefits differ for applicants and participants.

For applicants, since EIV does not contain SS or SSI benefit information, the GRHC will ask applicants to provide a copy of their current SS and/or SSI benefit letter (dated within the last 120 calendar days) for each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the GRHC will help the applicant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The GRHC will obtain the original benefit letter from the applicant, make a photocopy of the document for the file, and return the original to the family.

For participants, the GRHC will obtain information through the HUD EIV system and confirm with the participants that the current listed benefit amount is correct.

- If the participant agrees with the amount reported in EIV, the GRHC will use the EIV-reported gross benefit amount to calculate annual income from Social Security. The GRHC is required to use the EIV-reported SS and SSI benefit amounts when calculating income unless the tenant disputes the EIV-reported amount. For example, an SSA benefit letter may list the monthly benefit amount as $450.80 and EIV displays the amount as $450.00. The GRHC will use the EIV-reported amount unless the participant disputes the amount.
- If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in EIV, the GRHC will request a current SSA benefit verification letter (dated within the last 120 calendar days) from each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the GRHC should help the participant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The GRHC will obtain the original benefit letter from the participant, make a photocopy of the document for the file, and return the original to the family.

Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits.

7-III.D. ALIMONY OR CHILD SUPPORT [Notice PIH 2023-27]

Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but which they do not receive. For example, a family's child support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders. A copy of a court order or other written payment agreement alone may not be sufficient verification of amounts received by a family.

The methods the GRHC will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it ***receives regular payments***, verification will be obtained in the following order of priority:

- Copies of the receipts and/or payment stubs for the 12 months prior to GRHC request
- Third-party verification form from the state or local child support enforcement agency
- Third-party verification form from the person paying the support
- Family's self-certification of amount received

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

7-III.E. NONRECURRING INCOME [Notice PIH 2023-27]

Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income. The GRHC will accept self-certification from the family stating that income will not be repeated in the coming year. However, the GRHC may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.

7-III.F. ASSETS AND INCOME FROM ASSETS

Net Family Assets [24 CFR 5.603]

For families with net assets totaling $50,000 or less, the GRHC will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The GRHC reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years.

When verification is required, in determining the value of checking or savings accounts, the GRHC will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, the GRHC will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]

Both at admission and reexam, the GRHC will accept self-certification from the family that the family does not have any present ownership in any real property. The certification will state that the family does not have any present ownership interest in any real property and must be signed by all family members 18 years of age and older. The GRHC reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

If the family declares they have a present ownership in real property, the GRHC will obtain third-party verification of the following factors: whether the family has the legal right to reside in

the property; whether the family has effective legal authority to sell the property; and whether the property is suitable for occupancy by the family as a residence. However, in cases where a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, the GRHC will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

7-III.G. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The GRHC needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28]. The GRHC will verify the value of assets disposed of only if:

- The GRHC does not already have a reasonable estimation of its value from previously collected information, or
- The amount reported by the family in the certification appears obviously in error.

> Example 1: An elderly participant reported a $10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this $10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.
>
> Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately $5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

7-III.H. NET INCOME FROM RENTAL PROPERTY

The family must provide:

- A current executed lease for the property that shows the rental amount or certification from the current tenant.
- A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).
- If schedule E was not prepared, the GRHC will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.I. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS [Notice PIH 2023-27]

The GRHC is not required to verify the amount of the family's federal tax refund or refundable tax credit(s) if the family's net assets are equal to or below $50,000 (adjusted annually for inflation), even in years when full verification of assets is required or if the GRHC does not

accept self-certification of assets. The GRHC must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than $50,000.

7-III.G. RETIREMENT ACCOUNTS

The GRHC will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken, and any regular payments.

7-III.K. INCOME FROM EXCLUDED SOURCES

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to document why third-party verification is not available, or report the income on the 50058. *Fully excluded income* is defined as income where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR 5.609(b) and any *Federal Register* notice on mandatory exclusions issued by HUD (for example, food stamps, earned income of a minor, or foster care funds).

The GRHC will accept the family's self-certification as verification of fully excluded income. The GRHC may request additional documentation if necessary to document the income source.

For partially excluded income, the GRHC **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student).

The GRHC will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.I. ZERO INCOME STATUS REVIEWS [Notice PIH 2023-27]

A *zero income review* is an assessment, sometimes periodic, performed by the GRHC of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. In calculating annual income, PHAs must not assign monetary value to nonmonetary in-kind donations from a food bank or similar organization received by the family [24 CFR § 5.609(b)(24)(vi)]. PHAs that perform zero income reviews must update local discretionary policies, procedures, and forms. Families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the Form HUD-50058.

If the family has reported zero income, the GRHC will conduct an interim reexamination every 3 months if the family continues to report that they have no income.

ATTACHMENT D

Excerpt, LIPH Admissions & Continued Occupancy Policy

Chapter 7
VERIFICATION
[24 CFR 960.259, 24 CFR 5.230, Notice PIH 2023-27]

INTRODUCTION
The GRHC must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The GRHC will not pass on the cost of verification to the family.

The GRHC will follow the verification guidance provided by HUD in Notice PIH 2023-27 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary GRHC policies.

Part I describes the general verification process. Part II provides more detailed requirements related to family information. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies established by the GRHC.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259; 24 CFR 5.230; and Notice PIH 2023-27]

Consent Forms

The family must supply any information that the GRHC or HUD determines is necessary to the administration of the program and must consent to GRHC verification of that information [24 CFR 960.259(a)(1)]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

Form HUD-9886-A [24 CFR 5.230(b)(1), (b)(2), (c)(4), and (c)(5); Notice PIH 2023-27]

All adult applicants and tenants must sign form HUD-9886A, Authorization for Release of Information. All adult family members (and the head and spouse/cohead regardless of age) are required to sign the Form HUD-9886 at admission. Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886-A be signed only once. On or after January 1, 2024 (regardless of the GRHC's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886-A at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886-A will not be submitted to the GRHC except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886 at the family's next annual or interim reexamination, whichever is earlier.

The purpose of form HUD-9886-A is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the GRHC may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

The GRHC may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the GRHC determines the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the GRHC to revoke consent.

Penalties for Failing to Consent [24 CFR 5.232]
If any family member who is required to sign a consent form fails to do so, the GRHC will deny admission to applicants and terminate the lease of tenants [24 CFR 5.232(a)]. The family may request a hearing in accordance with the GRHC's grievance procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the GRHC to access financial records from financial institutions. The GRHC has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with GRHC policy. In order for a family to revoke their consent, the family must provide written notice to the GRHC.

Within 15 calendar days of the date the family provides written notice, the GRHC will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the GRHC will notify the local HUD office.

7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

The GRHC will not utilize other programs' income determinations as part of its program management.

7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]

When the GRHC does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, then the GRHC will use a streamlined income determinations where applicable.
If 90 percent or more of a family's unadjusted income is from fixed income sources:

- The GRHC will streamline the annual reexamination process by applying the verified inflationary adjustment factor to fixed-income sources.
- The family will be required to sign a self-certification stating that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year.
- The GRHC will document in the file how the determination that a source of income was fixed was made.
- Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.
- If the family's sources of fixed income have changed from the previous year, the GRHC will obtain third-party verification of any new sources of fixed income.

When less than 90 percent of a family's unadjusted income consists of fixed income:

- The GRHC will apply a COLA to each of the family's sources of fixed income.
- All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.

In the following circumstances, regardless of the percentage of income received from fixed sources, the GRHC will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

- Of all assets when net family assets exceed $50,000;
- Of all deductions and allowances from annual income;
- If a family member with a fixed source of income is added;
- If verification of the COLA or rate of interest is not available;
- During the intake process and at least once every three years thereafter.

7-I.D. VERIFICATION HIERARCHY [Notice PIH 2023-27]

When the GRHC does not use a streamlined determination of income or an income determination from a means-tested federal assistance program, HUD requires the GRHC to obtain third-party verification of:

- Reported family annual income;
- The value of net family assets when the net value exceeds $50,000 (as adjusted annually);
- Expenses related to deductions from annual income; and
- Other factors that affect the determination of adjusted income.

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general, HUD requires the GRHC to use the most reliable form of verification that is available and to document the reasons when the GRHC uses a lesser form of verification.
HUD developed a hierarchy that described verification documentation from most acceptable to least acceptable. The GRHC will demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed.
In order of priority, the hierarchy is:

- Highest: Level 6: Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Highest: Level 5: Up-front Income Verification (UIV) using a non-EIV system
- High: Level 4:
  - Written third-party verification from the source, also known as "tenant-provided verification"
  - Or EIV plus self-certification
- Medium: Level 3: Written third-party verification form
- Medium: Level 2: Oral third-party verification
- Low: Level 1: Self-certification (not third-party verification)

Each of the verification methods is discussed in subsequent sections below.

File Documentation

The GRHC will document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the GRHC has followed all of the verification policies set forth in this ACOP. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

7-I.E. LEVEL 5 AND 6 VERIFICATION: UP-FRONT INCOME VERIFICATION (UIV)

Up-front income verification (UIV) refers to the GRHC's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits for a number of individuals. The GRHC may use UIV sources before or during a family reexamination.

UIV will be used to the extent that these systems are available to the GRHC. There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the GRHC has independently verified the UIV information and the family has been granted the opportunity to contest any adverse findings through the GRHC's informal review/hearing processes.

Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System

The GRHC will use HUD's EIV system in its entirety as a third-party source to verify tenant employment and income information during annual and streamlined reexaminations of family composition and income in accordance with 24 CFR 5.236 and Notice PIH 2023-27.

HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. The income validation tool (IVT) in EIV provides projections of discrepant income for wages, unemployment compensation, and SSA benefits pursuant to HUD's data sharing agreements with other departments.
The following policies apply to the use of HUD's EIV system.

EIV Income and IVT Reports

Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, the GRHC will obtain EIV Income and IVT reports for all annual reexaminations for all families on a monthly basis. Reports will be generated as part of the regular reexamination process. The GRHC will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV. Income and IVT reports will be retained in resident files with the applicable annual documents or interim reexamination documents (if applicable) for the duration of tenancy. When the GRHC determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

New Hires Report [Notice PIH 2023-27]

The New Hires Report identifies participant families who have new employment within the last six months. The report is updated monthly. The GRHC will review this information at annual reexamination.
In accordance with GRHC policies in Chapter 9, the GRHC does not process interim reexaminations for families who have increases in earned income. The GRHC will only review the New Hires Report at annual reexamination.

No Income Reported by HHS or SSA Report

The GRHC will generate the No Income Reported by HHS or SSA Report quarterly and will retain the report.

The GRHC will re-verify the status of tenants identified on the report quarterly. Based on the information provided by the family and in EIV, the GRHC may require that family members provide verifications or sign release forms in order to obtain additional verification.

When the GRHC determines through this report and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

EIV Identity Verification Report

The GRHC will identify residents whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

The GRHC will attempt to resolve discrepancies by obtaining appropriate documentation from the tenant. When the GRHC determines that discrepancies exist as a result of GRHC errors, such as spelling errors or incorrect birth dates, it will correct the errors promptly.

Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]
The GRHC will review the Deceased Tenants Report on a monthly basis.

When the Deceased Tenants Report identifies an individual as being deceased, The GRHC will immediately send a letter to the head of household or emergency contact person (if the head of household is deceased and there is no other adult household member) to confirm the death of the listed household member. The GRHC will conduct a home visit to determine if anyone is residing in the unit.

The GRHC is required to list the move-out date for the family as of the date on which the family or designee of the deceased tenant's estate returned the keys and signed a vacate notice; the date the public housing lease was terminated; or the date the GRHC legally regained possession of the unit, whichever occurs first.

When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for continued occupancy. The GRHC will not designate the live-in aide as the new head of household or change the relation code on the Form HUD-50058.

Other EIV Reports [Notice PIH 2023-27]
The GRHC is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening and Failed Verification (Failed SSA Identity Test) reports at least monthly.

Upfront Income Verification Using Non-HUD Systems
The GRHC will inform all applicants and residents of its use of UIV, if ever utilized.

7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]

HUD identifies two types of Level 4 verification: written-third party verification from the source and EIV + self-certification.

EIV + Self-Certification

At annual reexamination, if the GRHC is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, the GRHC will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

The GRHC will use an average of the last two quarters of income listed in EIV to determine income from employment. The GRHC will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, the GRHC will use written third-party verification from the source as outlined below.

The GRHC will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

Written Third-Party Verification from the Source

Written, third-party verification from the source is also known as "tenant-provided verification." In order to qualify as written-third party verification from the source, the documents must be original or authentic and (generally) dated within 120 days of the date received by the GRHC. For fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation. Documents may be supplied by the family or received from a third-party source. Examples of acceptable tenant-provided documents include, but are not limited to pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices. Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.) are an acceptable form of written, third-party verification.

The GRHC is required to obtain, at minimum, two current and consecutive pay stubs when calculating income using third-party verification from the source. For new income sources or when two pay stubs are not available, the PHA should determine income based on the information from a traditional written, third-party verification form or the best available information. When the family disputes EIV-reported employment income, the PHA uses written third-party verification.

When verification of assets is required, the GHRC is required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts.

In general, the GRHC will use third-party verification from the source in the following circumstances:

- At annual reexamination when EIV + self-certification is not used;

- For all new admissions; and
- For all interim reexaminations.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by the GRHC. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

The GRHC may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If the GRHC determines that third-party documents provided by the family are not acceptable, the GRHC will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, the GRHC will obtain one statement that reflects the current balance of the account. When pay stubs are used, the GRHC will require the family to provide the two most current, consecutive pay stubs. At the GRHC's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the GRHC may request additional paystubs or a payroll record.

7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM [Notice PIH 2023-27]

This type of verification is a form developed by the PHA and used uniformly for all families when needed to collect information from a third-party source. This is known as "traditional third-party verification." The GRHC sends a GRHC-developed form directly to the third-party source by mail, fax, or email and the source completes the form by hand (in writing or typeset).

Typically, the GRHC will attempt to send written third-party verification forms to the verification source whenever higher forms of verification are unavailable. However, on a case-by-case basis, the GRHC may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form.

7-I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]

For third-party oral verification, The GRHC contact sources, identified by UIV techniques or by the family, by telephone or in person.

Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 15 calendar days.

The GRHC will document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed.

The GRHC may skip this level of verification if they attempted written third-party verification via a form and the source did not respond and move directly to self-certification.

When Third-Party Verification is Not Required [Notice PIH 2023-27]

Third-party verification may not be available in all situations. HUD has acknowledged that it may not be cost-effective or reasonable to obtain third-party verification of income, assets, or expenses when these items would have a minimal impact on the family's total tenant payment.

If the family cannot provide original documents, the GRHC will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family. The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].

Primary Documents

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION TECHNIQUE: SELF-CERTIFICATION [Notice PIH 2023-27]

Non-third-party verification consists of a signed statement of reported income and/or expenses. This verification method should be used as a last resort when the GRHC has not been successful in obtaining information via all other required verification techniques.

Self-certification, however, is an acceptable form of verification when:

- A source of income is fully excluded;
- Net family assets total $50,000 or less;
- The family declares that they do not have any present ownership in any real property;
- A family states that they have non-recurring income that will not be repeated in the coming year; and/or

When the GRHC is required to obtain third-party verification but instead relies on self-certification, the family's file must be documented to explain why third-party verification was not available.

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the GRHC. The GRHC may require a family to certify that a family member does not receive a particular type of income or benefit.

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

All self-certifications will include the following language:

> "I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)."

ATTACHMENT E

HCV Administrative Plan

Chapter 8

NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE AND RENT REASONABLENESS DETERMINATIONS

[24 CFR 5 Subpart G and Notice PIH 2024-26]

INTRODUCTION

Owners must maintain all units occupied by families receiving Housing Choice Voucher (HCV) and Project Based Voucher (PBV) assistance in accordance with housing quality standards. Units assisted under the program must comply with HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) regulations and standards no later than October 1, 2025. The inspection performance standards and procedures for conducting NSPIRE inspections must be included in the administrative plan [Notice PIH 2024-26].

All units must pass an inspection prior to the approval of a lease (with some exceptions) and at least once every 24 months (or 36 months for small rural PHAs) during the term of the HAP contract, and at other times as needed, to determine that the unit meets housing quality standards. HUD also requires PHAs to determine that rents for units under the program are reasonable when compared to comparable unassisted units in the market area.

Provided they meet certain requirements, HUD permits PHAs to establish some additional local requirements in their administrative plans. The use of the term *NSPIRE standard*s in this plan refers to the combination of both HUD and PHA-established requirements. However, state and local codes, compliance is not part of the determination of whether a unit passes the NSPIRE standards.

This chapter explains HUD and GRHC requirements related to physical inspections and rent reasonableness as follows:

> Part I. Physical Standards. This part discusses NSPIRE standards required of units occupied by HCV and PBV-assisted families. It also identifies affirmative habitability requirements for all units and life-threatening conditions that must be corrected in 24 hours.
>
> Part II. The Inspection Process. This part describes the types of inspections the GRHC will make and the steps that will be taken when units do not meet NSPIRE standards.
>
> Part III. Rent Reasonableness Determinations. This part discusses the policies the GRHC will use to make rent reasonableness determinations.

Special requirements for homeownership, manufactured homes, and other special housing types are discussed in Chapter 15 to the extent that they apply in this jurisdiction. Special requirements for the PBV and RAD PBV programs (if applicable) are discussed in Chapters 17 and 18, respectively.

PART I: NSPIRE STANDARDS

NSPIRE standards are published on HUD's NSPIRE website as well as in the NSPIRE Final Rule [FR Notice 5/1//2023].

8-I.A. INSPECTABLE AREAS [24 CFR 5.703(a)(1) and 24 CFR 5.705(a)(2)]

NSPIRE defines the inspectable areas for inspection under the standards as inside, outside and unit. However, the inspection requirement for the HCV and PBV programs only applies to units occupied or to be occupied by HCV or PBV participants and common areas and exterior areas which either service or are associated with such units.

8-I.B. AFFIRMATIVE HABITABILITY REQUIREMENTS [24 CFR 5.703(b), (c), and (d)]

NSPIRE provides for minimum, or affirmative, habitability requirements for each area (unit, inside, outside). These areas must meet these requirements for habitability, which are listed in Exhibit 8-1.

The inside, outside and unit must be free of health and safety hazards that pose a danger to residents. Types of health and safety concerns include, but are not limited to carbon monoxide, electrical hazards, extreme temperature, flammable materials or other fire hazards, garbage and debris, handrail hazards, infestation, lead-based paint, mold, and structural soundness [24 CFR 5.703(e).

The NSPIRE Smoke Alarm Standard does not require that smoke alarms have a sealed battery; however, upon the effective date of the Public and Federally Assisted Housing Fire Safety Act of 2022 on December 29, 2024, sealed batteries *will* be required.

8-I.C. MODIFICATIONS TO PROVIDE ACCESSIBILITY [24 CFR 100.203; Notice 2003-31; and Notice PIH 2014-02]

Under the Fair Housing Act of 1988 an owner must make reasonable accommodations in rules, policies, practices, or services if necessary for a person with disabilities to use the housing and must not refuse the request of a family that contains a person with a disability to make necessary and reasonable modifications to the unit if such modification is necessary to afford the person with a disability full enjoyment of the premises. Such modifications are at the family's expense. The owner may, where it is reasonable to do so, require restoration of the unit to its original condition (reasonable wear and tear excepted) if the modification would interfere with the owner or next occupant's full enjoyment of the premises. The owner may not increase a customarily required security deposit. However, the landlord may negotiate a restoration agreement that requires the family to restore the unit and, if necessary to ensure the likelihood of restoration, may require the tenant to pay a reasonable amount into an interest- bearing escrow account over a reasonable period of time. The interest in any such account accrues to the benefit of the tenant. The owner may also require reasonable assurances that the quality of the work will be acceptable and that any required building permits will be obtained. [24 CFR 100.203; Notice 2003-31].

Modifications to units to provide access for a person with a disability must meet all applicable NSPIRE requirements and conform to the design, construction, or alteration of facilities contained in the UFAS and the ADA Accessibility Guidelines (ADAAG) [28 CFR 35.151(c) and

Notice 2003-31] See Chapter 2 of this plan for additional information on reasonable accommodations for persons with disabilities.

Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to the GRHC for review.

8-I.D. ADDITIONAL LOCAL REQUIREMENTS [24 CFR 5.705(a)(3) and Notice PIH 2024-26]

The GRHC has not requested any HUD-approved variations to NSPIRE standards.

8-I.E. LIFE-THREATENING DEFICIENCIES [Notice PIH 2024-26]

HUD previously required the GRHC to define life-threatening conditions in the administrative plan. The NSPIRE standards now describe those conditions which are considered life-threatening and must be corrected within 24 hours.

The following are a list of life-threatening deficiencies under NSPIRE:

Inspectable Item	Deficiency
Call-for-Aid System	System is blocked, or pull cord is higher than 6 inches off the floor.
	System does not function properly
Carbon Monoxide Alarm	Carbon monoxide alarm is missing, not installed, or not installed in a proper location.
	Carbon monoxide alarm is obstructed.
	Carbon monoxide alarm does not produce an audio or visual alarm when tested.
Chimney	A visually accessible chimney, flue, or firebox connected to a fireplace or wood-burning appliance is incomplete or damaged such that it may not safely contain fire and convey smoke and combustion gases to the exterior.
	Chimney exhibits signs of structural failure.
Clothes Dryer Exhaust Ventilation	Electric dryer transition duct is detached or missing.
	Gas dryer transition duct is detached or missing.
	Electric dryer exhaust ventilation system has restricted airflow.
	Dryer transition duct is constructed of unsuitable material.
	Gas dryer exhaust ventilation system has restricted airflow.
Door – Entry	Entry door is missing.
Door – Fire Labeled	Fire labeled door is missing.

Inspectable Item	Deficiency
Egress	Obstructed means of egress.
	Sleeping room is located on the third floor or below and has an obstructed rescue opening.
	Fire escape is obstructed.
Electrical – Conductor, Outlet, and Switch	Outlet or switch is damaged.
	Exposed electrical conductor.
	Water is currently in contact with an electrical conductor.
Electrical – Service Panel	The overcurrent protection device is damaged.
Exit Sign	Exit sign is damaged, missing, obstructed, or not adequately illuminated.
Fire Escape	Fire escape component is damaged or missing.
Fire Extinguisher	Fire extinguisher pressure gauge reads over or under-charged.
	Fire extinguisher service tag is missing, illegible, or expired.
	Fire extinguisher is damaged or missing.
Flammable and Combustible Items	Flammable or combustible item is on or within 3 feet of an appliance that provides heat for thermal comfort or a fuel-burning water heater; OR Improperly stored chemicals.
Guardrail	Guardrail is missing or not installed.
	Guardrail is not functionally adequate.
Heating, Ventilation, and Air Conditioning (HVAC)	The inspection date is on or between October 1 and March 31 and the permanently installed heating source is not working or the permanently installed heating source is working and the interior temperature is below 64 degrees Fahrenheit.
	Unvented space heater that burns gas, oil, or kerosene is present.
	Combustion chamber cover or gas shutoff valve is missing from a fuel burning heating appliance.
	Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing.
Leak – Gas or Oil	Natural gas, propane, or oil leak.
Mold-like Substance	Presence of mold-like substance at extremely high levels is observed visually.
Smoke Alarm	Smoke alarm is not installed where required.
	Smoke alarm is obstructed.

Inspectable Item	Deficiency
	Smoke alarm does not produce an audio or visual alarm when tested.
Sprinkler Assembly	Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head.
	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance.
	Sprinkler assembly has evidence of corrosion.
	Sprinkler assembly has evidence of foreign material that is detrimental to performance.
Structural System	Structural system exhibits signs of serious failure.
Toilet	Only 1 toilet was installed, and it is missing.
Water Heater	Chimney or flue piping is blocked, misaligned, or missing.
	Gas shutoff valve is damaged, missing, or not installed.

In addition to those listed under the NSPIRE standards, the following is considered life-threatening conditions: Utilities not in service, including no running hot water.

8-I.F. OWNER AND FAMILY RESPONSIBILITIES [24 CFR 982.404]

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Family Responsibilities

The family is responsible for correcting the following deficiencies:

- Tenant-paid utilities not in service
- Failure to provide or maintain appliances owned by the family
- Damage to the unit or premises caused by a household member or guest beyond ordinary wear and tear.

If a family fails to correct a family-caused life-threatening condition as required by the GRHC, the GRHC will enforce the family obligations. See 8-II.H. Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

Owner Responsibilities

The owner must maintain the unit in accordance with housing quality standards. The owner is not responsible for a breach of housing quality standards that is not caused by the owner, and for which the family is responsible (as provided in 24 CFR 982.404(b) and 982.551(c)).

The owner is responsible for all housing quality violations not listed as a family responsibility above, even if the violation is caused by the family's living habits (e.g., vermin infestation). However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family.

The owner will be required to repair an inoperable smoke detector unless the GRHC determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

If an owner fails to correct life-threatening conditions as required by the GRHC, the GRHC will enforce the housing quality standards in accordance with HUD requirements. See 8-II-G.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later.

Owner Obligation

The GRHC will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.

Family Responsibilities

The family may be held responsible for a breach of housing quality standards caused by any of the following:

- Tenant-paid utilities not in service;
- Failure to provide or maintain appliances owned by the family; and
- Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

If the GRHC has waived the owner's responsibility to remedy the violation as outlined under the owner obligations above, the following applies:

- If the housing quality standards breach caused by the family is life-threatening, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 24 hours of notification.
- For other family-caused deficiencies, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 30 calendar days of notification (or any GRHC-approved extension).

If the family has caused a breach of housing quality standards, the GRHC will take prompt and vigorous action to enforce the family obligations. The GRHC may terminate assistance for the family in accordance with 24 CFR 982.552.

8-I.G. LEAD-BASED PAINT

The GRHC and owners must comply with the requirements and timelines in 24 CFR Part 35 Subpart M—Tenant-Based Rental Assistance and Subpart H—Project-Based Assistance. The GRHC and owners are reminded that any deteriorated paint in target housing, or other lead-based paint hazard identified through a lead-based paint risk assessment or lead-based paint inspection is considered a violation of NSPIRE standards.

For the HCV program, Subpart M applies to units where a child under age six resides or is expected to reside, common areas that service that unit, and exterior painted surfaces associated with that unit or common areas. For project-based programs, Subpart H applies to assisted units and common areas of the property regardless of whether a child under age six resides or is expected to reside in the unit. NSPIRE does not alter any of the lead-based paint requirements in Part 35 for these programs.

Special Requirements for Children with Elevated Blood Lead Level [24 CFR 35.1225; FR Notice 1/13/17; Notice PIH 2017-13]

If the GRHC is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than six years of age, living in an HCV-assisted unit has been identified as having an elevated blood lead level, the GRHC must complete an environmental investigation of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. The environmental investigation must be completed in accordance with program requirements, and the result of the environmental investigation must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner.

Within 30 days after receiving the environmental investigation report from the GRHC, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330; 40 CFR 745.227]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in violation of NSPIRE and the GRHC will take action in accordance with Section 8-II.G.

The GHRC reporting requirements, and data collection and record keeping responsibilities related to children with an elevated blood lead level are discussed in Chapter 16.

8-I.H. VIOLATION OF SPACE STANDARDS [24 CFR 5.703(d)(5)]

Units assisted under the HCV or PBV programs must have at least one bedroom or living/sleeping room for each two persons. A living room may be used as sleeping (bedroom) space, but no more than two persons may occupy the space [HCV GB p. 10-6]. Each habitable room must have two working outlets or one working outlet and a permanent light. HUD defines a *habitable room* as a room in a building for living, sleeping, eating, or cooking, but excluding bathrooms, toilet rooms, closets, hallways, storage or utility spaces, and similar areas [FR Notice 5/11/23].

A unit that does not meet these space standards is defined as *overcrowded*.

If the GRHC determines that a unit is overcrowded because of an increase in family size or a change in family composition, the GRHC will issue the family a new voucher, and the family and GRHC will try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the GRHC will terminate the HAP contract in accordance with its terms.

PART II: THE INSPECTION PROCESS

8-II.A. OVERVIEW [24 CFR 982.405]

Types of Inspections

The GRHC conducts the following types of inspections as needed. Each type of inspection is discussed in the paragraphs that follow.

- *Initial Inspections*. The GRHC conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program.
- *Periodic Inspections*. HUD requires the GRHC to inspect each unit under lease at least annually or biennially (or triennially for small rural PHAs as defined in 24 CFR 982.305(b)(2)), depending on GRHC policy, to confirm that the unit still meets housing quality standards.
- *Interim Inspections.* A special inspection may be requested by the owner, the family, or a third party as a result of problems identified with a unit between annual inspections.
- *Supervisory Control Inspections.* HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with housing quality standards.

Inspection of GRHC-Owned Units [24 CFR 982.352(b)]

The GRHC will obtain the services of an independent entity to perform all inspections in cases where an HCV family is receiving assistance in a PHA-owned unit as defined in 24 CFR 982.4. The independent entity must communicate the results of each inspection to the family and the GRHC. The independent agency must be approved by HUD and may be the unit of general local government for the GRHC jurisdiction (unless the GRHC is itself the unit of general local government or an agency of such government). The GRHC must inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease. GRHC-owned unit is freely selected by the family, without GRHC pressure or steering.

For information on the inspection of GRHC-owned units in the PBV program, see Chapters 17 and 18.

GRHC MTW Flexibility

The GRHC will no longer require a third party to conduct inspections at PBV properties that the GRHC has an interest in. The GRHC will follow the inspection process utilizing the current HUD inspection method that is used for all other properties (NSPIRE). The inspections will be subject to GRHC's voucher program quality control process. Participants will also be able to request an interim inspection or review by a supervisor at any time if they feel an inspection need was not met.

Inspection Costs [Notice PIH 2016-05 and 24 CFR 5.705(h)]

The GRHC will not charge the family for unit inspections or reinspection [24 CFR 982.405(e)].

The GRHC will not charge the owner for the inspection of the unit prior to the initial term of the lease or for a first inspection during assisted occupancy of the unit. The GRHC will not charge a fee for failed reinspection.

Remote Video Inspections (RVIs) [Notice PIH 2020-31]

The GRHC is not currently conducting physical standard inspections with RVI.

Notice and Scheduling

Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life-threatening emergency, reasonable notice is considered to be not less than 48 hours. Inspections may be scheduled between 8:00 a.m. and 5:00 p.m. Generally, inspections will be conducted on business days only. In the case of a life-threatening emergency, the GRHC will give as much notice as possible, given the nature of the emergency.

Owner and Family Inspection Attendance

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

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

8-II.B. INITIAL NSPIRE INSPECTION [24 CFR 982.401(a)]

Initial Inspections [FR Notice 1/18/17]

The unit must pass the NSPIRE inspection on or before the effective date of the HAP contract.

The GRHC will not rely on alternative inspections and will conduct an NSPIRE inspection for each unit prior to executing a HAP contract with the owner.

GRHC MTW Flexibility

The GRHC will offer pre-qualifying inspections for units in its jurisdiction. Passing pre-qualifying inspections will be valid for 90 days from the passed inspection date. Participants will be able to request an interim inspection after moving in.

Timing of Initial Inspections [24 CFR 982.305(b)(2)(i)]

The GRHC will complete the initial inspection, determine whether the unit satisfies NSPIRE, and notify the owner and the family of the determination within 15 calendar days of submission of the Request for Tenancy Approval (RTA).

Inspection Results and Reinspections

If any NSPIRE violations are identified, the owner will be notified of the deficiencies and be given a time frame to correct them. If requested by the owner, the time frame for correcting the deficiencies may be extended by the GRHC for good cause. The GRHC will reinspect the unit within seven (7) calendar days of the date the owner notifies the GRHC that the required corrections have been made.

If the time period for correcting the deficiencies (or any GRHC -approved extension) has lapsed, or the unit fails NSPIRE at the time of the reinspection, the GRHC will notify the owner and the family that the unit has been rejected and that the family must search for another unit. The GRHC may agree to conduct a second reinspection, for good cause, at the request of the family and owner.

Following a failed reinspection, the family may submit a new Request for Tenancy Approval for the same unit after the owner has made repairs, if they are unable to locate another suitable unit.

Utilities

Generally, at initial lease-up the owner is responsible for demonstrating that all utilities are in working order including those utilities that the family will be responsible for paying.

If utility service is not available for testing at the time of the initial inspection, the GRHC will allow the utilities to be placed in service after the unit has met all other NSPIRE requirements. The GRHC will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the GRHC.

Appliances [Form HUD-52580]

If the family is responsible for supplying the stove and/or refrigerator, the GRHC will allow the stove and refrigerator to be placed in the unit after the unit has met all other NSPIRE requirements. The required appliances must be in place before the HAP contract is executed by the GRHC. The GRHC will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 calendar days of HAP contract approval.

8-II.C. ANNUAL/BIENNIAL NSPIRE INSPECTIONS [24 CFR 982.405 and 982.406; Notice PIH 2016-05]

Scheduling the Inspection

If an adult cannot be present on the scheduled date, the family should request that the GRHC reschedule the inspection. The GRHC and family will agree on a new inspection date that generally should take place within seven (7) calendar days of the originally scheduled date. The GRHC may schedule an inspection more than seven (7) calendar days after the original date for good cause.

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

GRHC MTW Flexibility

Each unit under HAP contract must be inspected biennially within 24 months of the last full NSPIRE inspection. If a unit is found to have a NSPIRE fail, unit will be required to participate in annual inspections for the subject unit for the period of 24 months before being returned to biennial inspections.. One or more substantiated complaints will also require the owner of that unit to participate in annual inspections for the period of 24 months before being returned to biennial inspections. The GRHC reserves the right to require annual inspections of any owner at any time. The GRHC will not rely on alternative inspection standards.

Scheduling the Inspection

If a participant or government official reports a life-threatening condition which the owner would be required to repair within 24 hours, the GRHC will inspect the unit within 24 hours of notification. If the reported condition is not life-threatening, the GRHC will inspect the unit within 15 calendar days of notification.

During a special inspection, the GRHC generally will inspect only those deficiencies that were reported. However, the inspector will record any additional NSPIRE deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the annual/biennial inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the GRHC may elect to conduct a full annual/biennial inspection.

8-II.D. INTERIM INSPECTIONS [24 CFR 982.405(d)]

During an interim inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the periodic inspection has been scheduled or is due within 90 days of the date the interim inspection is scheduled the PHA may elect to conduct a full inspection.

8-II.E. SUPERVISORY QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); 24 CFR 985.3(e); HCV GB, p. 10-32]

HUD requires a GRHC supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the NSPIRE.

The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.

8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

Correction Timeframes

Each deficiency is identified in the NSPIRE standards as either life-threatening, severe, moderate, or low.

For units under HAP contract, life-threatening deficiencies must be corrected within 24 hours after notice has been provided. All other non-life-threatening deficiencies (severe and moderate) must be corrected within 30 days (or a GRHC-approved extension) after notice has been provided. If low deficiencies are present in a unit, these deficiencies result in a pass and would only be noted by the inspector for informational purposes.

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Notification of Corrective Actions

When life-threatening deficiencies are identified, the GRHC will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the GRHC's notice.

When failures that are severe or moderate are identified, the GRHC will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction. If low deficiencies are identified, these deficiencies will only be noted for informational purposes.

The notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any GRHC-approved extension), the owner's HAP will be abated in accordance with GRHC policy (see 8-II.G.).

Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any GRHC-approved extension, if applicable) the family's assistance will be terminated in accordance with GRHC policy (see Chapter 12).

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

Notification of Corrective Actions [24 CFR 982.404(d)(1)]

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, the GRHC will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

The GRHC will not withhold assistance payments upon notification of the deficiencies to the owner.

When life-threatening conditions are identified, the GRHC will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the GRHC's notice.

When failures that are not life-threatening are identified, the GRHC will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.

If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with GRHC policy (see 8-II.G.).

Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any GRHC-approved extension, if applicable) the family's assistance will be terminated in accordance with GRHC policy (see Chapter 12).

Extensions

For life-threatening deficiencies, the GRHC cannot grant an extension to the 24-hour corrective action period. For conditions that are severe or moderate, the GRHC may grant an exception to the required time frames for correcting the violation, if the GRHC determines that an extension is appropriate.

Extensions will be granted in cases where the GRHC has determined that the owner has made a good faith effort to correct the deficiencies and is unable to for reasons beyond the owner's control. Reasons may include, but are not limited to:

- A repair cannot be completed because required parts or services are not available.
- A repair cannot be completed because of weather conditions.
- A reasonable accommodation is needed because the family includes a person with disabilities.

The length of the extension will be determined on a case-by-case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. The necessary repairs must be made within 15 calendar days, once the weather conditions have subsided.

Reinspections [24 CFR 982.405(i)]

The GRHC will conduct a reinspection immediately following the end of the corrective period, or any GRHC approved extension.

The family and owner will be given reasonable notice of the reinspection appointment. If the deficiencies have not been corrected by the time of the reinspection, the GRHC will send a notice of abatement to the owner, or in the case of family caused violations, a notice of termination to the family, in accordance with GRHC policies. If the GRHC is unable to gain entry to the unit in order to conduct the scheduled reinspection, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

The GRHC will not accept self-certification of repairs. Photos or other documentation of repairs will not be accepted in lieu of a reinspection.

8-II.G. ENFORCING OWNER COMPLIANCE

If the owner fails to maintain the dwelling unit in accordance with NSPIRE standards, the GRHC will take prompt and vigorous action to enforce the owner obligations.

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

HAP Abatement

If an owner fails to correct deficiencies by the time specified by the GRHC, HUD requires the GRHC to abate housing assistance payments no later than the first of the month following the specified correction period (including any approved extension) [24 CFR 985.3(f)]. No retroactive payments will be made to the owner for the period of time the rent was abated. Owner rents are not abated as a result of deficiencies that are the family's responsibility.

The GRHC will make all HAP abatements effective the first of the month following the expiration of the PHA specified correction period (including any extension).

The GRHC will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent. The owner must not seek payment from the family for abated amounts and may not use the abatement as cause for eviction.

HAP Contract Termination

The maximum length of time that HAP may be abated is 90 calendar days. However, if the owner completes corrections and notifies the GRHC before the termination date of the HAP contract, the GRHC may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

The GRHC will not terminate the contract until the family finds another unit, provided the family does so in a reasonable time [HCV GB p. 10-29] and will give the owner 30 calendar days of notice of termination. The GRHC will issue a voucher to permit the family to move to another unit as described in Chapter 10.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

HAP Withholding [24 CFR 982.404(d)(1)]

The PHA will not withhold assistance payments upon notification to the owner of the deficiencies.

HAP Abatement [24 CFR 982.404(d)(2)]

The GRHC will make all HAP abatements effective the first of the month following the expiration of the GRHC-specified correction period (including any extension).

The GRHC will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent.

For GRHC policies on family moves when units are in abatement and termination of the HAP contract when a family moves due to deficiencies, see Section 10-I.B.

HAP Contract Termination

The maximum length of time that HAP may be abated is 60 days. However, if the owner completes corrections and notifies the GRHC before the termination date of the HAP contract, the GRHC may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the GRHC is 30 days. The GRHC will issue a voucher to permit the family to move to another unit as described in Chapter 10.

8-II.H. ENFORCING FAMILY COMPLIANCE [24 CFR 982.404(b)]

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Families are responsible for correcting any deficiencies listed in paragraph 8-I.D. If the family fails to correct a violation within the period allowed by the GRHC (and any extensions), the GRHC will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

If the GRHC waived the landlord responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, (see section 8-I.D), the family is responsible for correcting any housing quality standards violations listed in paragraph 8.I.D. If the family fails to correct a violation within the period allowed by the GRHC (and any extensions), the GRHC will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair and may enter into a repayment agreement with the family.

PART III: RENT REASONABLENESS [24 CFR 982.507]

8-III.A. OVERVIEW

Except in the case of certain LIHTC- and HOME-assisted units, no HAP contract can be approved until the GRHC has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

GRHC-Owned Units [24 CFR 982.352(b)]

In cases where an HCV family is receiving assistance in a GRHC-owned unit, the GRHC will obtain the services of an independent entity to determine rent reasonableness in accordance with program requirements, and to assist the family in negotiating the contract rent when the family requests assistance. A GRHC-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the GRHC). The independent agency must communicate the results of the rent reasonableness determination to the family and the GRHC. The independent agency must be approved by HUD and may be the unit of general local government for the GRHC jurisdiction (unless the GRHC is itself the unit of general local government or an agency of such government).

GRHC MTW Flexibility

The GRHC will no longer require a third party to conduct rent reasonableness tests at PBV properties that the GRHC owns, manages, or controls. The GRHC will follow the rent reasonableness process used for all other HCV properties and conduct the test using a Web based service provided by a third party. These tests will be subject to GRHC's voucher program quality control processes.

8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED

Owner-Initiated Rent Determinations

The GRHC will make a rent reasonableness determination at initial occupancy and whenever the owner requests a rent adjustment.

The owner and family first negotiate the rent for a unit. The GRHC (or independent agency in the case of GRHC-owned units) will assist the family with the negotiations upon request. At initial occupancy the GRHC must determine whether the proposed rent is reasonable before a HAP Contract is signed. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent HQS inspection have been corrected.

After the initial occupancy period, the owner may request an annual rent adjustment effective on the participant's anniversary date. For rent increase requests after initial lease-up, the GRHC may request owners to provide information about the rents charged for other units on the premises, if the premises include more than 4 units. In evaluating the proposed rents in comparison to other units on the premises the GRHC will consider unit size and length of tenancy in the other units.

The GRHC will determine whether the requested increase is reasonable within 15 calendar days of receiving the request from the owner. The owner will be notified of the determination in writing.

An owner's request for a rent increase must be submitted to the GRHC 60 calendar days prior to the anniversary date of the HAP contract, and must include the new rent amount the owner is proposing.

GRHC and HUD-Initiated Rent Reasonableness Determinations

The GRHC will make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 10 percent decrease in the fair market rent that goes into effect at least 60 days before the contract anniversary date. HUD also may direct the GRHC to make a determination at any other time. The GRHC may decide that a new determination of rent reasonableness is needed at any time.

In addition to the instances described above, the GRHC will make a determination of rent reasonableness at any time after the initial occupancy period if: (1) the GRHC determines that the initial rent reasonableness determination was in error or (2) the GRHC determines that the information provided by the owner about the unit or other units on the same premises was incorrect.

LIHTC and HOME-Assisted Units [24 CFR 982.507(c)]

For units receiving low-income housing tax credits (LIHTCs) or units assisted under HUD's HOME Investment Partnerships (HOME) Program, a rent comparison with unassisted units is not required if the voucher rent does not exceed the rent for other LIHTC- or HOME-assisted units in the project that are not occupied by families with tenant-based assistance.

For LIHTCs, if the rent requested by the owner does exceed the LIHTC rents for non-voucher families, the GRHC must perform a rent comparability study in accordance with program regulations. In such cases, the rent shall not exceed the lesser of: (1) the reasonable rent as determined from the rent comparability study; or (2) the payment standard established by the GRHC for the unit size involved.

8-III.C. HOW COMPARABILITY IS ESTABLISHED

Factors to Consider

The GRHC will take into consideration the factors listed below when determining rent comparability. The GRHC may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made
- Amenities, services, and utilities included in the rent

Units that Must Not Be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance [Notice PIH 2002-22, Notice PIH 2005-20, and Notice PIH 2020-19].

Note: Notice PIH 2020-19, issued August 21, 2020, provides further guidance on the issue of what constitutes an assisted unit.

Rents Charged for Other Units on the Premises

The Request for Tenancy Approval (HUD-52517) requires owners to provide information, on the form itself, about the rent charged for other unassisted comparable units on the premises if the premises include more than 4 units.

By accepting the PHA payment each month the owner certifies that the rent is not more than the rent charged for comparable unassisted units on the premises. If asked to do so, the owner must give the PHA information regarding rents charged for other units on the premises.

8-III.D. PHA RENT REASONABLENESS METHODOLOGY

How Market Data Is Collected

The GRHC will primarily utilize a web based service to collect and maintain data on market rents in the GRHC's jurisdiction. The third-party will collect and maintain data on market rents in the GRHC 's jurisdiction. Information sources may include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

How Rents Are Determined

The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. The third party will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the GRHC may make adjustments to the range of prices to account for these differences.

The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).

Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom).

The adjustment must reflect the rental value of the difference—not its construction costs (e.g., it might cost $20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rental units are presumed to have functioning roofs).

When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of $500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: $500 x 11 months = 5500/12 months = actual monthly rent of $488.

The GRHC will notify the owner of the rent the GRHC can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The GRHC will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any

additional information within seven (7) calendar days of the GRHC's request for information or the owner's request to submit information.

EXHIBIT 8-1: AFFIRMATIVE HABITABILITY REQUIREMENTS

Affirmative Habitability Requirements: Inside
Must include at least 1 battery-operated or hard-wired smoke detector, in proper working condition, on each level of the property.
Must meet or exceed the carbon monoxide detection standards set by the Secretary through *Federal Register* notification.
Any outlet installed within 6 feet of a water source must be GFCI protected.
Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or greater measured vertically.
Must have permanently mounted light fixtures in any kitchens and each bathroom.
May not contain unvented space heaters that burn gas, oil or kerosene.

Affirmative Habitability Requirements: Outside
Any outlet installed within 6 feet of a water source must be GFCI-protected.
Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or greater measured vertically.

Affirmative Habitability Requirements: Unit
Must have hot and cold running water in the bathroom and kitchen, including an adequate source of safe drinking water in the bathroom and kitchen.
Must include its own bathroom or sanitary facility that is in proper operating condition and usable in privacy. It must contain a sink, a bathtub or shower, and an interior flushable toilet.
Must have at least one battery-operated or hard-wired smoke detector, in proper working condition, in the following locations: • On each level of the unit AND • Inside each bedroom or sleeping area AND • With 21 feet of any door toa bedroom measured along a path of travel AND • Where a smoke detector is installed outside a bedroom is separated from an adjacent living area by a door, a smoke detector must also be installed in the living area side of the door.
If the unit is occupied by a hearing-impaired person, the smoke detectors must have an alarm system designed for hearing-impaired persons.
Must have a living room and a kitchen area with a sink, cooking appliance, refrigerator, food preparation area and food storage area.
Must have two working outlets or one working outlet and one permanent light fixture within all habitable rooms.
Must have a permanently mounted light fixture in each bathroom and in the kitchen.
Outlets within 6 feet of water source must be GFCI-protected.
Must have permanently installed heating source.
No units may contain unvented space heaters that burn gas, oil or kerosene.
Must have a guard rail when there is an elevated walking surface with a drop off of 30 inches or greater measured vertically.
Must have at least one bedroom or living/sleeping room for each two persons.

GRHC Notice of Owner Selection [24 CFR 983.51(d)]

Within 15 calendar days of the GRHC making the selection, the GRHC will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owners.

In addition, the GRHC will publish its notice for selection of GRHC proposals for two consecutive days in the same newspapers and trade journals the GRHC used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. The GRHC will also post the notice of owner selection on its electronic web site.

The GRHC will make available to any interested party its rating and ranking sheets and documents that identify the GRHC 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 GRHC will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.

17-II.C. HOUSING TYPE [24 CFR 983.52]

The GRHC may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an agreement to enter into a housing assistance payments contract that was executed prior to the start of construction. A housing unit is considered an existing unit for purposes of the PBV program, if, at the time of notice of GRHC selection, the units substantially comply with HQS. Units for which new construction or rehabilitation began after the owner's proposal submission but prior to the execution of the HAP do not subsequently qualify as existing housing. Units that were newly constructed or rehabilitated in violation of program requirements also do not qualify as existing housing.

The GRHC will decide what housing type, new construction, rehabilitation, or existing housing, will be used to develop project-based housing. The GRHC choice of housing type must be reflected in its solicitation for proposals.

17-II.D. PROHIBITION OF ASSISTANCE FOR CERTAIN UNITS

Ineligible Housing Types [24 CFR 983.53]

The GRHC may not attach or pay PBV assistance to units on the grounds of a penal reformatory, medical, mental, or similar public or private institution; nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (except that assistance may be provided in assisted living facilities); units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students; and transitional housing. In addition, the GRHC will not attach or pay PBV assistance for a unit occupied by an owner and the GRHC will not select or enter into an agreement to enter into a HAP contract or HAP contract for a unit occupied by a family ineligible for participation in the PBV program. A member of a cooperative who owns shares in the project assisted under the PBV program is not considered an owner for purposes of participation in the PBV program.

GRHC MTW Flexibility

The GRHC will permit the attachment of project based vouchers to shared housing and manufactured homes, as permitted by the MTW Operations Manual.

Finally, PBV assistance may not be attached to units for which construction or rehabilitation has started after the proposal submission and prior to the execution of an AHAP.

Subsidized Housing [24 CFR 983.54]

The GHRC will not attach or pay PBV assistance to units in any of the following types of subsidized housing:

- A public housing unit;
- A unit subsidized with any other form of Section 8 assistance;
- A unit subsidized with any governmental rent subsidy;
- A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;
- A unit subsidized with Section 236 rental assistance payments (except that a PHA may attach assistance to a unit subsidized with Section 236 interest reduction payments);
- A Section 202 project for non-elderly with disabilities;
- Section 811 project-based supportive housing for persons with disabilities;
- Section 202 supportive housing for the elderly;
- A Section 101 rent supplement project;
- A unit subsidized with any form of tenant-based rental assistance;
- A unit with any other duplicative federal, state, or local housing subsidy, as determined by HUD or the GRHC in accordance with HUD requirements.

17-II.E. SUBSIDY LAYERING REQUIREMENTS [24 CFR 983.55, Notice PIH 2013-11, and FR Notice 3/13/23]

The subsidy layering review is intended to prevent excessive public assistance by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits.

HUD requires new construction and rehabilitation housing that will include forms of governmental assistance other than PBVs to undergo a subsidy layering review (SLR) prior to entering into an Agreement to Enter into Housing Assistance Payments Contract (AHAP). Subsidy layering requirements do not apply to existing housing, when PBV is the only governmental assistance, or for projects already subject to a PBV HAP contract, even if the project is recapitalized with outside sources of funding.

When the GRHC selects a new construction or rehabilitation project, the GRHC will require information regarding all HUD and/or other federal, state, or local governmental assistance to be

PART III: VETERANS AFFAIRS SUPPORTIVE HOUSING (VASH) PROGRAM

19-III.A. OVERVIEW

Since 2008, HCV program funding has provided rental assistance under a supportive housing program for homeless veterans. The Veterans Affairs Supportive Housing (VASH) program combines HCV rental assistance with case management and clinical services provided by the Department of Veterans Affairs (VA) at VA medical centers (VAMCs) and Community-Based Outpatient Clinics (CBOCs). Eligible families are homeless veterans and their families that agree to participate in VA case management and are referred to the VAMC's partner GRHC for HCV assistance. The VAMC or CBOC's responsibilities include:

- Screening homeless veterans to determine whether they meet VASH program participation criteria;
- Referring homeless veterans to the GRHC;
  - The term *homeless veteran* means a veteran who is homeless (as that term is defined in subsection (a) or (b) of Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)). See 38 U.S.C. 2002.
- Providing appropriate treatment and supportive services to potential VASH participants, if needed, prior to GRHC issuance of a voucher;
- Providing housing search assistance to VASH participants;
- Identifying the social service and medical needs of VASH participants, and providing or ensuring the provision of regular ongoing case management, outpatient health services, hospitalization, and other supportive services as needed throughout the veterans' participation period; and
- Maintaining records and providing information for evaluation purposes, as required by HUD and the VA.

VASH vouchers are awarded noncompetitively based on geographic need and PHA administrative performance. Eligible PHAs must be located within the jurisdiction of a VAMC and in an area of high need based on data compiled by HUD and the VA. When Congress funds a new allocation of VASH vouchers, HUD invites eligible PHAs to apply for a specified number of vouchers.

Generally, the HUD-VASH program is administered in accordance with regular HCV program requirements. However, HUD is authorized to waive or specify alternative requirements to allow PHAs to effectively deliver and administer VASH assistance. Alternative requirements are established in the HUD-VASH Operating Requirements, which were originally published in the Federal Register on May 6, 2008, and updated September 27, 2021, and then again in August 13, 2024. Unless expressly waived by HUD, all regulatory requirements and HUD directives regarding the HCV program requirements are applicable to VASH vouchers, including the use of all HUD-required contracts and other forms, and all civil rights and fair housing requirements. In addition, the GRHC may request additional statutory or regulatory waivers that it determines are necessary for the effective delivery and administration of the program.

The VASH program is administered in accordance with applicable Fair Housing requirements since civil rights requirements cannot be waived under the program. These include applicable authorities under 24 CFR 5.105(a) and 24 CFR 982.53 including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act, and the Age Discrimination Act and all GRHC policies as outlined in Chapter 2 of this document.

When HUD-VASH recipients include veterans with disabilities or family members with disabilities, reasonable accommodation requirements in Part II of Chapter 2 of this policy apply.

19-III.B. REFERRALS [FR Notice 8/13/24 and HUD-VASH Qs and As]

VAMC case managers will screen all families in accordance with VA screening criteria and refer eligible families to the GRHC for determination of program eligibility and voucher issuance. The GRHC has no role in determining or verifying the veteran's eligibility under VA screening criteria, including determining the veteran's homelessness status. The GRHC will accept referrals from the partnering VAMC and must maintain written documentation of referrals in VASH tenant files. Upon turnover, VASH vouchers must be issued to eligible veteran families as identified by the VAMC.

In order to expedite the screening process, the GRHC will provide all forms and a list of documents required for the VASH application to the Grand Rapids Veterans Affairs Medical Center (VAMC). Case managers will work with veterans to fill out the forms and compile all documents prior to meeting with the GRHC and submitting an application. When feasible, the VAMC case manager should email copies of all documents to the GRHC prior to the meeting in order to allow the GRHC time to review them and start a file for the veteran.

After the VAMC has given the GRHC a complete referral, the GRHC will perform an eligibility screening within seven (7) calendar days of receipt of a VAMC referral.

19-III.C. HCV PROGRAM ELIGIBILITY [FR Notice 8/13/24]

Eligible participants are homeless veterans and their families who agree to participate in case management from the VAMC.

- A *VASH Veteran* or *veteran family* refers to either a single veteran or a veteran with a household composed of two or more related persons. It also includes one or more eligible persons living with the veteran who are determined to be important to the veteran's care or well-being.
- A veteran for the purpose of VASH is a person whose length of service meets statutory requirements, and who served in the active military, naval, or air service, was discharged or released under conditions other than dishonorable, and is eligible for VA health care.

Under VASH, the GRHC does not have authority to determine family eligibility in accordance with HCV program rules and PHA policies. The only reasons for denial of assistance by the GRHC are failure to meet the income eligibility requirements and/or that a family member is subject to a lifetime registration requirement under a state sex offender registration program. Under portability, the receiving PHA must also comply with these VASH screening requirements.

Social Security Numbers

When verifying Social Security numbers (SSNs) for homeless veterans and their family members, The GHRC will use available flexibilities in accordance with 24 CFR 5.216(g)(1)(iii) to accept self-certification of SSNs and at least one third-party document, such as a bank statement, utility or cell phone bill, or benefit letter that contains the name of the individual in the absence of other documentation.

In the case of the homeless veteran, the GRHC will accept the Certificate of Release or Discharge from Active Duty (DD-214) or the VA-verified Application for Health Benefits (10-10EZ) as verification of SSN if these forms are available and cannot require the veteran to provide a Social Security card. A VA-issued identification card may also be used to verify the SSN of a homeless veteran.

Proof of Age

The DD-214 or 10-10EZ must be accepted as proof of age in lieu of birth certificates or other GRHC-required documentation as outlined in Section 7-II.C. of this policy. A VA-issued identification card may also be used to verify the age of a homeless veteran.

Photo Identification

A VA-issued identification card must be accepted in lieu of another type of government-issued photo identification.

Income Eligibility [FR Notice 8/13/24]

With some exceptions, the The GRHC will determine income eligibility for VASH families in accordance with 24 CFR 982.201 and policies in Section 3-II.A. Low-income families (80 percent of AMI) are eligible for assistance under VASH, and the GHRC will not condition eligibility based on additional eligibility criteria specified in its administrative plan. If the family is over-income based on the most recently published income limits for the family size, the family will be ineligible for HCV assistance.

The following alternative requirements related to income apply to VASH families:

- The GRHC will determine the applicant's annual income for purposes of income eligibility by excluding all VA service-connected benefits received by the applicant. This special income exclusion only applies to the definition of *annual income* for purposes of determining income eligibility. If the HUD-VASH applicant qualifies as a low-income family under the alternative requirement, the VA service-connected benefits (with the exception of the normally excluded deferred VA disability payments under 24 CFR 5.609(b)(16) and the payments related to aid and attendance under 24 CFR 5.609(b)(17)) must still be included as annual income when calculating the family's adjusted income. In other words, the VA service-connected disability benefits are excluded for purposes of determining income eligibility but included for purposes of calculating the family's total tenant payment (TTP), housing assistance payment (HAP), and family share.
- When a veteran family reports that they have zero income, the GRHC will accept a self-certification of zero income from the family at admission and at reexamination without taking any additional steps to verify the family is indeed zero income. The self-certification does not need to be notarized. The GRHC verify families' income in the Enterprise Income

Verification (EIV) system within 120 days after admission. The GRHC will not deny zero income families.

- Regardless of GRHC policy, in determining compliance with the asset limitation at admission, for the VASH program, the GRHC must accept a self-certification by the family that the family's total assets are equal to or less than the HUD-published asset limitation amount (adjusted annually) and that the family does not have any present ownership interest in real property, without taking additional steps to verify the accuracy of the declaration.
- The GHRC will not enforce the asset limitation for VASH families at reexamination.

In addition, because there needs to be a monthly housing assistance payment (HAP) in order to enter into a HAP contract on behalf of a tenant-based voucher family, the utilization of tenant-based VASH assistance by families determined income-eligible is limited to those areas where the family's (TTP) is less than the applicable payment standard or exception payment standard (including any VASH-specific exception payment standard established by the GRHC). The family must select a unit with a gross rent that is above the family's TTP in order to lease a unit with the tenant-based VASH voucher.

Minimum Rent [FR Notice 8/13/24]

The GRHC will establish a minimum rent of $0 for VASH families.

Screening [FR Notice 8/13/24]

The GRHC will not screen any potentially eligible family members or deny assistance for any grounds permitted under 24 CFR 982.552 and 982.553 with one exception: the GRHC is still required to prohibit admission if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program. Accordingly, with the exception of denial for registration as a lifetime sex offender under state law and PHA policies on how sex offender screenings will be conducted, GRHC policy in Sections 3-III.B. through 3-III.E. do not apply to VASH. The prohibition against screening families for anything other than lifetime sex offender status applies to all family members, not just the veteran.

Denial of Assistance [Notice PIH 2008-37]

Once a veteran is referred by the VAMC, the GRHC will either issue a voucher or deny assistance. If the GRHC denies assistance, it must provide the family with prompt notice of the decision and a brief statement of the reason for denial in accordance with Section 3-III.F. Like in the standard HCV program, the family must be provided with the opportunity for an informal review in accordance with policies in Section 3-III.F. In addition, a copy of the denial notice must be sent to the VAMC case manager.

19-III.D. CHANGES IN FAMILY COMPOSITION

Adding Family Members [FR Notice 8/13/24]

When adding a family member after the family has been admitted to the program, GRHC policies in Section 3-II.B. apply. Other than the birth, adoption, or court-awarded custody of a child, the GRHC will approve additional family members and will apply its regular screening criteria in doing so.

Remaining Family Members [HUD-VASH Qs and As]

If the homeless veteran dies while the family is being assisted, the voucher would remain with the remaining members of the tenant family. The GRHC will use one of its own regular vouchers, if available, to continue assisting this family and free up a VASH voucher for another VASH-eligible family. If a regular voucher is not available, the family would continue utilizing the VASH voucher. Once the VASH voucher turns over, however, it must go to a homeless veteran family.

Family Break Up [HUD-VASH Qs and As]

In the case of divorce or separation, since the set-aside of VASH vouchers is for veterans, the voucher must remain with the veteran. This overrides the PHA's policies in Section 3-I.C. on how to determine who remains in the program if a family breaks up.

19-III.E. LEASING [FR Notice 8/13/24]

Waiting List

The GRHC does not have the authority to maintain a waiting list or apply local preferences for HUD–VASH vouchers. Policies in Chapter 4 relating to applicant selection from the waiting list, local preferences, special admissions, cross-listing, and opening and closing the waiting list do not apply to VASH vouchers.

Exception Payment Standards [FR Notice 8/13/24]

To assist VASH participants in finding affordable housing, especially in competitive markets, HUD allows the GRHC to establish a HUD-VASH exception payment standard. The GHRC may go up to but no higher than 120 percent of the published metropolitan area-wide fair market rent (FMR). If the GRHC wants to establish a VASH exception payment standard over 120 percent it must still request a waiver from HUD through the regular waiver process outlined in Notice PIH 2018-16, or any successor notices.

Exception payment standards implemented by the GRHC under this section also apply in determining rents under 24 CFR 983.301(b) for PBV projects only when the project is comprised solely of units exclusively made available to VASH families.

The GRHC may also establish an exception payment standard up to 140 percent of the published FMR only to be applied if required as a reasonable accommodation for a family that includes a person with a disability. Any unit approved under an exception payment standard must still meet reasonable rent requirements. The GRHC may use a payment standard that is greater than 140 percent of FMR as a reasonable accommodation for a person with a disability, but only with HUD approval.

Voucher Issuance [FR Notice 8/13/24]

All VASH vouchers will have an initial term of 120 calendar days.

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

The GRHC will track issuance of HCVs for families referred by the VAMC or CBOC in HUD Systems as required in FR Notice 8/13/24.

Special Housing Types [FR Notice 8/13/24]

The GRHC will permit VASH clients to use the following special housing types for tenant-based VASH assistance, regardless of whether these types are permitted in their administrative plan for other families:

- Single room occupancy (SRO);
- Congregate housing;
- Group home;
- Shared housing; and
- Cooperative housing.

Initial Lease Term FR Notice 8/13/24]

Unlike in the standard the HCV program, VASH voucher holders may enter into an initial lease that is for less than 12 months. Accordingly, GRHC policy in Section 9-I.E., Term of Assisted Tenancy, does not apply.

Ineligible Housing FR Notice 8/13/24]

Unlike in the standard HCV program, VASH families are permitted to live on the grounds of a VA facility in units developed to house homeless veterans. Therefore, 24 CFR 982.352(a)(5) and 983.53(a)(2), which prohibit units on the physical grounds of a medical, mental, or similar public or private institution, do not apply to VASH for this purpose only. Accordingly, GRHC policy in 9-I.D., Ineligible Units, does not apply for this purpose only.

HQS Pre-Inspections FR Notice 8/13/24]

To expedite the leasing process, the GRHC will pre-inspect available units that veterans may be interested in leasing to maintain a pool of eligible units. If a VASH family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the RTA, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305. The veteran will be free to select his or her unit.

When a pre-inspected unit is not selected, the GRHC will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for both initial and any required reinspection.

19-III.F. PORTABILITY [FR Notice 3/23/12 and Notice PIH 2011-53]

General Requirements

Portability policies under VASH depend on whether the family wants to move within or outside of the initial VA facility's catchment area (the area in which the VAMC or CBOC operates). In all cases, the initial VA facility must be consulted prior to the move and provide written confirmation that case management will continue to be provided in the family's new location. VASH participant families may only reside in jurisdictions that are accessible to case management services, as determined by case managers at the partnering VAMC or CBOC.

Under VASH, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial GRHC when they applied. As a result, GRHC

policies in Section 10-II.B. about nonresident applicants do not apply. A family that moves under the portability procedures must not be subject to rescreening by the receiving PHA.

If the family no longer requires case management, there are no portability restrictions. Normal portability rules apply.

Portability within the Initial VAMC's Catchment Area

A VASH family can move within the VAMC's catchment area as long as case management can still be provided, as determined by the VA. If the initial PHA's partnering VAMC will still provide the case management services, the receiving PHA must process the move in accordance with portability procedures:

- If the receiving PHA has been awarded VASH vouchers, it can choose to either bill the initial PHA or absorb the family if it has a VASH voucher available to do so.
  - If the PHA absorbs the family, the VAMC or CBOC providing the initial case management must agree to the absorption and the transfer of case management.
- If the receiving PHA does not administer a VASH program, it must always bill the initial PHA.

Portability Outside of the Initial VAMC's Catchment Area

If a family wants to move to another jurisdiction where it will not be possible for the initial PHA's partnering VAMC or CBOC to provide case management services, the initial VAMC must first confirm that the new VAMC has an available VASH case management slot and the new VAMC's partner PHA has an available VASH voucher.

After acceptance of the veteran by the new VAMC, the new VAMC will refer the veteran to its partner PHA. In these cases, the family must be absorbed by the receiving PHA either as a new admission or as a portability move-in, as applicable. Upon absorption, the initial PHA's VASH voucher will be available to lease to a new VASH-eligible family, and the absorbed family will count toward the number of VASH slots awarded to the receiving PHA.

Portability Outside of the Initial VAMC or DSP's Catchment Area under VAWA

Veterans who request to port beyond the catchment area of the VAMC or DSP where they are receiving case management to protect the health or safety of a person who is or has been the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and who reasonably believes they are threatened with imminent harm from further violence by remaining in the unit may port prior to receiving approval from the receiving VAMC or DSP. The initial PHA must follow its emergency transfer plan (see Exhibit 16-3). PHAs may require verbal self-certification or a written request from a participant seeking a move beyond the catchment area of the VAMC or DSP.

The verbal self-certification or written request must include either a statement expressing why the participant reasonably believes that there is a threat of imminent harm from further violence if they were to remain in the same unit or a statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-day period preceding the participants request for the move.

The participant must still port to a PHA that has a VASH program. If the receiving PHA does not have a VASH voucher available to lease, they may bill the initial PHA until a VASH voucher is available, at which point the porting veteran must be absorbed into the receiving PHA's program.

19-III.G. TERMINATION OF ASSISTANCE [FR Notice 8/13/24]

VASH participant families may not be terminated after admission for a circumstance or activities that occurred prior to admission and were known to the GRHC but could not be considered at the time of admission due to VASH program requirements. The GRHC may terminate the family's assistance only for program violations that occur after the family's admission to the program.

There are two alternative requirements for termination of assistance for VASH participants.

Cessation of Case Management

As a condition of receiving HCV rental assistance, a HUD-VASH-eligible family must receive case management services from the VAMC or DSP. A VASH participant family's assistance must be terminated for failure to participate, without good cause, in case management as verified by the VAMC or DSP. However, the GRHC may offer the family continued assistance through one of its regular vouchers or a PBV unit not exclusively made available for HUD-VASH.

However, a VAMC or DSP determination that the participant family no longer requires case management is not grounds for termination of voucher or PBV assistance. In such a case, at its option, the GHRC may offer the family continued assistance through one of its regular vouchers. The decision to transfer assistance to a regular voucher must consider veteran preference and must be communicated to the VA prior to occurring. If the GRHC has no voucher to offer, the family will retain its VASH voucher, or PBV unit, until such time as the GRHC has an available voucher (or PBV unit not exclusively made available for VASH) for the family. If the GRHC has no voucher to offer, the family will retain its VASH voucher or PBV unit until such time as the GRHC has an available voucher for the family.

Serious Violation of the Lease

The regulation at 24 CFR 982.552(b)(2) states that the GRHC must terminate program assistance for a family evicted from housing assisted under the program for serious violation of the lease. HUD waived this provision, and established the alternative requirement that the GRHC may terminate program assistance in this case. Prior to terminating VASH participants for this reason, HUD strongly encourages to exercise their discretion under 24 CFR 982.552(c)(2) and consider all relevant circumstances of the specific case, as well as including the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination, prior to determining whether to terminate assistance.

VAWA [FR Notice 8/13/24]

When a veteran's family member is receiving protection under VAWA because the veteran is the perpetrator of domestic violence, dating violence, sexual assault, stalking, or human trafficking the victim must continue to be assisted. Upon termination of the perpetrator's VASH assistance, the victim should be given a regular HCV if one is available, and the perpetrator's VASH voucher should be used to serve another eligible veteran family. If a regular HCV is not available, the victim will continue to use the VASH voucher even after the perpetrator's assistance is terminated.

19-III.H. PROJECT-BASING VASH VOUCHERS

General Requirements [Notice PIH 2017-21 and FR Notice 8/13/24]

The GRHC may administer project-based VASH vouchers under two circumstances. First, PHAs are authorized to project-base their tenant-based VASH vouchers without additional HUD review or approval in accordance with Notice PIH 2017-21 and all PBV program requirements provided that the VAMC will continue to make supportive services available. Second, since 2010, HUD has awarded VASH vouchers specifically for project-based assistance in the form of PBV HUD-VASH set-aside vouchers. While these vouchers are excluded from the PBV program cap as long as they remain under PBV HAP contract at the designated project, all other VASH vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A. Note that VASH supportive services only need to be provided to VASH families receiving PBV assistance in the project, not all families receiving PBV assistance in the project. If a VASH family does not require or no longer requires case management, the unit continues to count as an excepted PBV unit as long as the family resides in the unit. In the description of units in Exhibit A of the HAP contract, the GRHC will indicate the number of units that will be exclusively made available to VASH families. The GRHC will refer only VASH families to PBV units exclusively made available to VASH families and to PBV units funded through a VASH PBV set-aside award.

If the GRHC project-bases VASH vouchers, the GRHC will retain documentation of the partnering VAMC's support. Policies for VASH PBV units will generally follow GRHC policies for the standard PBV program as listed in Chapter 17, with the exception of the moves policy listed below.

If a VASH family is referred to the GRHC and there is an available PBV unit that is not exclusively made available to VASH families, the GRHC may offer to refer the family to the owner if allowable under the selection policy for that project, and the owner and GRHC may amend the HAP contract to designate the PBV unit as a VASH PBV unit.

The GRHC and owner may agree to amend a PBV HAP contract to redesignate a regular PBV unit as a unit specifically designated for VASH families so long as the GRHC first consults with the VAMC or DSP. Additionally, the GRHC and owner may agree to amend a PBV HAP contract to redesignate a unit specifically designated for VASH families as a regular PBV unit, so long as the unit is not funded through a VASH PBV set-aside award and is eligible for regular PBV (i.e., the unit is not on the grounds of a medical facility and the unit is eligible under the GRHC's program and project caps). Policies for VASH PBV units will generally follow PHA policies for the standard PBV program as listed in Chapter 17, with the exception of the policies listed below.

Ineligible Units

Unlike in the regular PBV program, the GRHC may opt to select an occupied unit or admit a family to a unit if such unit is made exclusively available to VASH families if the PBV project is either on the grounds of a VA facility or there are VASH supportive services provided on-site at the project.

Termination of Assistance

A VASH family's PBV assistance must be terminated for failure to participate in case management when required by the VA. However, the GRHC may allow the veteran family to receive a regular (non-VASH) tenant-based voucher or PBV unit instead of the family's assistance being terminated. In this case, the GRHC may:

- Substitute the family's unit on the PBV HAP contract for another unit (the GRHC may, in conjunction with such substitution, add the original unit to the PBV HAP contract with a non-VASH voucher if it is possible to do so;
- Remove the unit from the PBV HAP contract so the family may remain with tenant-based assistance, if the family and the owner agree to use the tenant-based voucher in the unit; or
- Change the unit's status in the PBV HAP contract from a unit exclusively made available for VASH to a regular PBV unit, if doing so is allowable under program rules.

If the family fails to participate in case management when required by the VA, the GRHC will terminate the family's assistance. The family will have 120 days to vacate the unit. The GRHC will terminate assistance to the family at the earlier of (1) the time the family vacates or (2) the expiration of the 120-day period. If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the GRHC will remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The GRHC may add the removed unit back onto the HAP contract after the ineligible family vacates the property.

Moves [HUD-VASH Qs and As]

If a VASH family is eligible to move from its PBV unit after a year of PBV assistance, the GRHC will generally follow policies in Chapter 17. However, if there is no VASH tenant-based voucher available at the time the family requests to move, the GRHC's actions depend on whether the family still requires case management.

- The GRHC may require a family that still requires case management to wait for a VASH tenant-based voucher for a period not to exceed 180 days. If a HUD-VASH tenant-based voucher is still not available after 180 days, the family must be allowed to move using its VASH voucher as tenant-based assistance. Alternatively, the GRHC may allow the family to move using its VASH voucher as tenant-based assistance without having to meet this 180-day waiting period. In either case, the GRHC may either amend the PBV HAP contract to replace the assistance in the PBV unit with one of its regular vouchers if the unit is eligible for a regular PBV or the GRHC and owner may agree to temporarily remove the unit from the HAP contract.

- If a VASH veteran has been determined to no longer require case management, the GRHC will allow the family to move with the first available tenant-based voucher. If no VASH voucher is immediately available, the GRHC will not require the family to wait for a VASH voucher to become available.

Wrong-Sized or Accessible Units

If the GRHC determines that a VASH family is occupying a wrong-size PBV unit or a PBV unit with accessibility features that the family does not require and the PBV unit is needed by a family that requires the accessibility features, the GRHC will notify the family and the owner within 30 days of the GRHC's determination. The GRHC's offer of continued housing assistance (that must be made within 60 days of the GRHC's determination) must be in the form of either a VASH tenant-based voucher or another VASH PBV unit. If no VASH assistance is available for the GRHC to offer within 60 days of the GRHC's determination, the GRHC will remove the wrong-sized or accessible unit from the HAP contract to make VASH voucher assistance available to the family.

Contract Terminations

The regulation at 24 CFR 983.206(b), which covers the required provision of tenant-based assistance and requires that the family may elect to use its tenant-based assistance to remain in the same project when a PBV HAP contract terminates or expires, does not apply to families issued a HUD-VASH tenant-based voucher under this circumstance. The GRHC may use another voucher to add the unit removed under this alternative requirement to the HAP contract after the family vacates the property, in accordance with 24 CFR 983.207(b).

Rents

Contract rents may not be different based on whether the unit is a VASH PBV unit or a non-VASH PBV unit. In determining the rent to owner for the PBV project, if the cap on the amount of rent to owner under 24 CFR 983.301(b)(1) is lower for non-HUD-VASH units than it is for the HUD-VASH units (e.g., the GRHC has established a HUD-VASH exception payment standard and there is either no exception payment standard or a lower exception payment standard for the regular HCV program for the area in question), that lower cap is applicable when setting the rent to owner for the PBV units in the project, including the HUD-VASH units.

Removing Units from the HAP Contract for Ineligible Families

The GRHC and owner may also agree to temporarily remove a unit from the HAP contract in cases where a HUDVASH eligible veteran has been identified by the VA as appropriate for a VASH PBV unit, but the veteran is not income eligible to receive voucher assistance or may not be selected for the PBV unit because the family's TTP exceeds the gross rent of the unit. Although the family would not be a program participant in the housing portion of the VASH program in such a case, the family would still benefit from the project's location on the grounds of a VA facility or from the VASH supportive services on-site at the project, while the VASH voucher would be available to assist another VASH family. The GRHC and owner may agree to add a VASH voucher back onto the PBV HAP contract if the family's income subsequently decreased to the point that there would be a HAP or when the family vacates the unit.

Zero HAP Families

Under normal PBV requirements, the GRHC may select an occupied unit to be included under a PBV HAP contract only if the unit's occupants are eligible for assistance under 24 CFR 982.201, and the TTP for the family is less than the gross rent for the unit. Furthermore, in selecting a family for an available PBV unit, typically the GRHC will determine the TTP for the family is less than the gross rent, meaning that the unit will be eligible for a monthly HAP. However, if the PBV project is either on the grounds of a VA facility or there are HUD-VASH supportive services provided onsite at the project, the GRHC may opt to select a unit occupied by a zero HAP VASH eligible family or admit a zero HAP VASH family to a unit if such unit is made exclusively available to VASH families. Until such time that the VASH family's TTP falls below the gross rent, the family is responsible for paying the entire rent to owner in addition to being responsible for paying all tenant-supplied utilities. During any period that the family's TTP falls below the gross rent, normal PBV requirements apply.

Further, under normally applicable rules, units occupied by families whose incomes have increased during their tenancy resulting in their TTP equaling the gross rent (zero HAP) must be removed from the HAP contract 180 days following the last housing assistance payment to the owner on the family's behalf. These regulations do not apply to zero HAP families admitted to the PBV project under this waiver and alternative requirement because there is no last housing assistance payment that would trigger the unit removal date of 180 days. As an alternative requirement, The GRHC has the option of removing the unit in which the zero HAP family resides from the HAP contract, but no earlier than 180 days from the start of the family PBV tenancy. If the GRHC exercises this option, the family may not be required to move from the unit as a consequence and continues to receive the VASH supportive services. If the project is fully assisted, the GRHC may reinstate the unit removed to the HAP contract after the family either vacates the unit or their income decreases to the point that there would be a HAP. If the project is partially assisted, the GRHC may substitute a different unit for the unit removed from the HAP contact when the first eligible substitute unit becomes available. Alternatively, the GRHC may choose to simply leave the unit on the HAP contract while the zero HAP family continues to reside there.

Proposal/Project Selection

PBV proposal and/or project selection for VASH must follow all regular proposal and/or project selection regulations, with one exception. HUD permits noncompetitive selection of one or more PBV projects with units made exclusively available to VASH families on the site of a VA facility. Note that the method of project selection must comply with all other requirements under 24 CFR 983.51, including that the GRHC will notify the public of its intent to noncompetitively select one or more projects for PBV assistance through its 5-Year Plan and to ensure any project selection is consistent with this administrative plan.

Failure to Participate in Case Management [FR Notice 8/13/24]

Upon notification by the VAMC or DSP that a VASH PBV family has failed to participate in case management without good cause, the GRHC will provide written notice of termination of assistance to the family and the owner within 10 business days. The family will be given 60 days from the date of the notice to move out of the unit.

The GRHC may make exceptions to this 60-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the GRHC will remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The GRHC will add the removed unit to the HAP contract after the ineligible family vacates the property.

Moves [HUD-VASH Qs and As, FR Notice 8/13/24]

When a VASH PBV family is eligible to move from its PBV unit in accordance with Section 17-VIII.C. of this policy, but there is no other comparable tenant-based rental assistance, the following procedures must be implemented:

- If a VASH tenant-based voucher is not available at the time the family wants (and is eligible) to move, the GRHC will require a family who still requires case management to wait for a VASH tenant-based voucher for a period not to exceed 180 days;
- If a VASH tenant-based voucher is still not available after that period, the family must be allowed to move with its VASH voucher. Alternatively, the GRHC will allow the family to move with its VASH voucher without having to meet this 180-day period. In either case, the GRHC is required to replace the assistance in the PBV unit with one of its regular vouchers, unless the GRHC and owner agree to temporarily remove the unit from the HAP contract; and
- If a VASH veteran is determined to no longer require case management, the GRHC will allow the family to move with the first available tenant-based voucher if no VASH voucher is immediately available and cannot require the family to wait for a VASH voucher to become available.

ATTACHMENT H

EXCERPT, HCV ADMINISTRATIVE PLAN CHAPTER 19
SPECIAL PURPOSE VOUCHERS

PART IV: MAINSTREAM VOUCHER PROGRAM

19-IV.A. PROGRAM OVERVIEW [Notice PIH 2020-01]

Mainstream vouchers assist non-elderly persons with disabilities and their families in the form of either project-based or tenant-based voucher assistance.

Aside from separate funding appropriations and serving a specific population, Mainstream vouchers follow the same program requirements as standard vouchers. The GRHC does not have special authority to treat families that receive a Mainstream voucher differently from other applicants and participants. For example, the GRHC cannot apply different payment standards, establish conditions for allowing portability, or apply different screening criteria to Mainstream families.

The Mainstream voucher program, (previously referred to as the Mainstream 5-Year program or the Section 811 voucher program) was originally authorized under the National Affordable Housing Act of 1990. Mainstream vouchers operated separately from the regular HCV program until the passage of the Frank Melville Supportive Housing Investment Act of 2010. Funding for Mainstream voucher renewals and administrative fees was first made available in 2012. In 2017 and 2019, incremental vouchers were made available for the first time since the Melville Act (in addition to renewals and administrative fees), and PHAs were invited to apply for a competitive award of Mainstream vouchers under the FY17 and FY19 NOFAs. In 2020, Notice PIH 2020-22 provided an opportunity for any PHA administering an HCV program to apply for Mainstream vouchers noncompetitively, while Notice PIH 2020-09 authorized an increase in Mainstream voucher units and budget authority for those PHAs already awarded Mainstream vouchers under the FY17 and FY19 NOFAs.

Funds for Mainstream vouchers may be recaptured and reallocated if the GRHC does not comply with all program requirements or fails to maintain a utilization rate of 80 percent for the GRHC's Mainstream vouchers.

The Consolidated Appropriations Act, 2024 (Public Law 118-42) authorized HUD to establish waivers and alternative requirements for Mainstream Vouchers related to the administration of waiting lists, local preferences, and the initial term and extensions of tenant-based vouchers. HUD is not permitted to waive requirements related to tenant rights and protections, rent setting, fair housing, nondiscrimination, labor standards, and the environment. Prior to this, Mainstream vouchers follow the same program requirements as standard vouchers.

19-IV.B. ELIGIBLE POPULATION [Notice PIH 2020-01 and Notice PIH 2020-22]

All Mainstream vouchers must be used to serve non-elderly persons with disabilities and their families, defined as any family that includes a person with disabilities who is at least 18 years old and not yet 62 years old as of the effective date of the initial HAP contract. The eligible disabled household member does not need to be the head of household.

The definition of person with disabilities for purposes of Mainstream vouchers is the statutory definition under section 3(b)(3)(E) of the 1937 Act, which is the same as is used for allowances and deductions in the HCV program and is provided in Exhibit 3-1 of this policy.

Existing families receiving Mainstream vouchers, where the eligible family member is now age 62 or older, will not "age out" of the program as long as the family was eligible on the day it was first assisted under a HAP contract.

The GRHC will not implement eligibility screening criteria for Mainstream vouchers that is different from that of the regular HCV program.

19-IV.C. PARTNERSHIP AND SUPPORTIVE SERVICES [Notice PIH 2020-01]

The GRHC has implemented a Mainstream program, and will continue to partner with various organizations to assist further assist persons with disabilities find and maintain housing.

19-IV.D. WAITING LIST ADMINISTRATION [Notice PIH 2024-30]

For Mainstream vouchers, HUD has waived 24 CFR 982.204(f), which requires one waiting list for the HCV program and allows the GRHC the discretion to operate a Mainstream voucher waiting list that is separate from the general HCV waiting list.

The GRHC will establish a separate waiting list for the Mainstream program.

All GRHC policies on opening, closing, and updating the waiting list in Chapter 4 will also apply to the Mainstream waiting list.

19-IV.E. PREFERENCES [Notice PIH 2024-30]

The GRHC did not claim a preference for a targeted group as part of an application for Mainstream vouchers under a NOFA. The GRHC will not offer any preferences on its Mainstream waiting list.

19-IV.F. VOUCHER ISSUANCE

Initial Search Term

The initial voucher term for all Mainstream vouchers, including those issued when a family wishes to exercise portability, will be 120 days.

Voucher Extension

At least 30 days prior to the expiration of the initial term of the voucher, the GRHC will contact the family to remind them of the expiration date of their voucher, the process for requesting an extension, and to inquire if the family needs assistance with their housing search. Depending on the family's preferred method of communication, the GRHC may contact the family via telephone, text message, email, or other accessible communication method. The GRHC will ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities.

Families may request an extension, either orally or in writing, at any time prior to the expiration of the family's voucher. All requests for extensions will automatically be granted without the requirement for the family to provide documentation. The initial extension period will be for 90 days. If the family requires additional extensions beyond 90 days, the family may request additional extensions, either orally or in writing, at any time prior to the expiration of the extended voucher term. All subsequent extensions will also be for a period of 90 days and will not require the family to meet certain circumstances or provide documentation. Each time the family requests an extension, the GRHC will inquire if the family needs assistance with their housing search and will provide a current listing of available accessible units known to the GRHC.

19-IV.G. PORTABILITY [Notice PIH 2020-01 and Mainstream Voucher Basics Webinar, 10/15/20]

Mainstream voucher participants are eligible for portability under standard portability rules and all GRHC policies regarding portability in Chapter 10, Part II apply to Mainstream families.

The following special considerations for Mainstream vouchers apply under portability:

- If the receiving GRHC has a Mainstream voucher available, the participant may remain a Mainstream participant.
  - If the receiving PHA chooses to bill the initial PHA, then the voucher will remain a Mainstream voucher.
  - If the receiving PHA chooses to absorb the voucher, the voucher will be considered a regular voucher, or a Mainstream voucher if the receiving PHA has a Mainstream voucher available, and the Mainstream voucher at the initial PHA will be freed up to lease to another Mainstream-eligible family.
- If the receiving PHA does not have a Mainstream voucher available, the participant may receive a regular voucher.

19-IV.H. PROJECT-BASING MAINSTREAM VOUCHERS [FY19 Mainstream Voucher NOFA Q&A]

The GRHC may project-base Mainstream vouchers in accordance with all applicable PBV regulations and GRHC policies in Chapter 17. The GRHC is responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable federal nondiscrimination and civil rights statutes and requirements. This includes, but is not limited to, Section 504 of the Rehabilitation Act (Section 504), Titles II or III of the Americans with Disabilities (ADA), and the Fair Housing Act and their implementing regulations at 24 CFR Part 8; 28 CFR Parts 35 and 36; and 24 CFR Part 100. Mainstream vouchers are subject to the PBV program percentage limitation discussed in Section 17-I.A.

ATTACHMENT I

HCV Administrative Plan

CHAPTER 20

MOVING TO WORK

INTRODUCTION

Moving to Work (MTW) is a demonstration program for public housing authorities (PHAs) that provides them the opportunity to design and test innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families. MTW allows PHAs exemptions from many existing public housing and voucher rules and provides funding flexibility with how they use their federal funds.

In September of 2022, the Grand Rapids Housing Commission (GRHC) was selected to be part of the Moving to Work Expansion – Asset Building Cohort. As part of this cohort, the GRHC must test asset building initiatives that encourage the growth of savings and/or aim to build credit for assisted households.

This chapter contains information about the Asset Building Program and Waivers the GRHC has selected.

There are two (2) parts to this chapter:

Part I: Asset Building Program (Aim to Save). This part includes a description of the Aim to Save Program and how the GRHC will administer the program.

Part II: MTW Activity Waivers. This part contains information about the MTW Waivers the GRHC has selected to implement (Note: Activities are only listed; policy changes will be reflected in their respective chapters).

PART I: ASSET BUILDING PROGRAM

1-I.A. Opt-Out Savings Account Option Selected:

The GRHC selected to implement Option C – PHA Designed Asset Building Option as stipulated in PIH Notice 2022-11 Section 3.

1-I.B. Aim to Save Program

The GHRC - designed asset building initiative will lead to strengthened household stability through savings, increased credit worthiness, and positive role modeling for our youth who will also be eligible to participate in the initiative. The GRHC will provide funds to HCV assisted households with the goal of increasing savings for our program participants and believe simply opening a savings account, depositing funds, and interacting with a financial institution will lead to greater financial stability when life altering events occur (paying rent vs. paying car) and opportunities to increasing credit worthiness. The GRHC will also use lessons learned from our successful FSS and homeownership programs to guide successful activities of the Asset Building program.

1-I.C. Selection Criteria

- The GRHC will select up to 40 assisted families to participate in the program.
- Program Participants will be selected from the following programs:
    - Housing Choice Voucher (HCV) Program
    - Project Based Voucher (PBV) Program
- The GRHC will identify households that have youth between the ages of 13 and 18.
- Notification will be provided to all eligible families and an application will be provided.
    - No contract of participation will be required to participate in the Aim to Save program, however, an acknowledgement of participation will be provided for signature.
    - Households do not need to be participating in GRHC's FSS program to participate in this savings program.
    - Participants may opt out of this activity at any time.
- The GRHC will randomize the selection of eligible families that have submitted an application.
- Each participant must agree to open a savings account with a partnering financial institution and will be offered educational opportunities around banking, saving and financial management.

1-I.D. Program Operation

- Each participating head of household will receive a monthly deposit of $50.00.
    - The number of contributions is not tied to income and will be made whether or not there is a corresponding increase in the participant contribution.
- Youth of participating head of households, ages 13-18 are eligible to participate in the savings program (up to 3 per household) and will receive a monthly deposit of $25.00.
- **Term:** Funds will be provided in the form of a savings account that will accrue for two (2) years or until the account reaches $5,200.00.

- Head of household participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to $1,000 per year for two (2) years.
- Youth participants may deposit additional amounts that will be matched by the GRHC on an annual basis of up to $500 per year for two (2) years.
- Participants must let the funds accumulate in the account for at least one (1) year before they can access the funds unless the participant demonstrates an urgent need.

1-I.E. HUD Asset Building Opt-out Group

The GRHC has partnered with the Department of Housing and Urban Development (HUD) to add an additional 50 families to study the effects of asset building initiatives have on assisted families. These families will be selected from all the GRHC's portfolio (including special voucher programs). Although the program will adhere to various aspects of the Aim to Save program, the following indicates the departure from the Aim to Save Program:

- Families will be selected randomly from the GRHC portfolio based on criteria established by HUD.
- A control group of 25 families will be selected randomly and will not have monthly deposits submitted by the GRHC.
- The GRHC will not match additional funds deposited by families into the savings accounts.
- The GRHC will only deposit funds into the Head of Household savings account.

PART II: MTW WAIVERS

(Note: Activities are only listed; policy changes will be reflected in their respective chapters).

1.II.A. Waiver Source and Selection

HUD has pre-approved more than 70 MTW Waivers permitting a range of activities in 17 categories. Those pre-approved MTW Waivers and MTW activities are provided in Appendix I of the MTW Operations Notice (Exhibit 20.1).

The GRHC can select new waivers, remove, and/or modify waiver activities annually during its annual plan submission in the MTW Supplemental Form, or amend during its fiscal year.

1.II.B. GRHC Selected Waivers

Below are the MTW Waivers selected by the GRHC to implement (Note: this may change on an annual basis, and will be updated as such):

- 2. Payment Standards and Rent Reasonableness (See Admin Plan Chapter 17)
  - 2.d - Rent Reasonableness – Third Party Requirement
- 3. Reexaminations (See Admin Plan Chapter 11)
  - 3.a - Alternative Reexamination Schedule for Households (PH)
  - 3.b - Alternative Reexamination Schedule for Households (HCV)
  - 3.c - Self-Certification of Assets (PH)
  - 3.d - Self-Certification of Assets (HCV)
- 4. Landlord Leasing Incentives (See Admin Plan Chapter 13)
  - 4.a - Vacancy Loss (HCV – Tenant-Based Assistance)
  - 4.c - Other Landlord Incentives (HCV – Tenant-Based Assistance)
- 5. Housing Quality Standards (See Admin Plan Chapter 8)
  - 5.a - Pre-Qualifying Unit Inspections (HCV)
  - 5.c - Third-Party Requirement (HCV)
  - 5.d - Alternative Inspection Schedule (HCV)
- 9. Project-Based Voucher Program Flexibilities (See Admin Plan Chapter 17)
  - 9.a - Increase PBV Program Cap (HCV) Plan to Implement in the Submission Year
  - 9.b - Increase PBV Project Cap (HCV) Plan to Implement in the Submission Year
  - 9.c - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)
  - 9.e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing)
  - 9.g - Increase PBV Rent to Owner (HCV) Plan to Implement in the Submission Year
- 17. Local, Non-Traditional Activities
  - 17.a – Rental Subsidy Program –
    - Subsidy grant for housing services for returning citizens from incarceration.

ATTACHMENT J

PHA Name: Grand Rapids Housing Commission

PHA Code : MI073
MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2025
PHA Program Type: Combined
MTW Cohort Number: Asset Building
MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Grand Rapids Housing Commission (GRHC) remains steadfast in its commitment to offering quality affordable housing, essential resources through advocacy and partnerships, and promoting self-sufficiency to strengthen communities. In alignment with this commitment, GRHC has adopted a new mission, vision, and values to guide its strategic direction and ensure that its programs and policies reflect the evolving needs of the community.

As a key provider of housing assistance in the region, GRHC continues to ensure that services are delivered in a responsible manner while fostering stable housing opportunities that support families, neighborhoods, and long-term economic mobility. Guided by its vision to create communities where housing is affordable, opportunities are impactful, and self-sufficiency is the goal, GRHC seeks innovative, data-informed, and community-focused approaches to enhance program effectiveness. Through collaboration and partnerships, education, and advocacy, GRHC works to ensure that residents not only have access to housing but also to the tools and resources needed to thrive.

GRHC actively pursues the three key statutory objectives of the Moving to Work (MTW) program, recognizing that creating impactful programs for low-income families requires a deep understanding of the local housing landscape. By leveraging MTW flexibilities, GRHC develops housing assistance programs, expands landlord and development partnerships, and introduces supportive service initiatives rooted in direct community feedback from stakeholders, including community partners, landlords, residents, and employees.

As GRHC continues to innovate and refine its housing programs, new initiatives will be implemented in the upcoming year to further enhance economic mobility and streamline administrative processes. These initiatives reflect GRHC's commitment to self-sufficiency, operational efficiency, and resident-centered policies, leveraging the flexibility of the Moving to Work (MTW) designation to improve service delivery and program outcomes.

Initiatives:
• Partnering with organizations that provide reentry support for returning citizens, ensuring access to housing resources that facilitate a successful transition back into the community. If funding permits.
• Expanding the use of project-based vouchers (PBVs) to increase affordable housing options.
• Implementing biennial reexaminations across the entire Housing Choice Voucher (HCV) portfolio, streamlining administrative processes and reducing burdens on program participants.
• Reducing administrative costs by minimizing reliance on third-party contracting for inspections, rent-reasonableness determinations, and PBV selection processes.
• Expanding incentives for landlords through vacancy loss payments, pre-qualified inspections, and flexible inspection schedules to increase participation in rental assistance programs.
• Strengthening the HCV and PBV portfolio utilization by reducing administrative barriers and expanding support for new affordable housing developments.

PHA-Designed Asset Building Initiative
GRHC implemented a PHA-Designed Asset Building initiative, designed to strengthen household financial stability, encourage savings, and foster positive financial habits among families and youth. This initiative aims to build long-term economic resilience, ensuring that participants were able to manage financial challenges and plan for the future.

Key components of the program included:
• Identifying households with youth between the ages of 13 and 18 and offering them the opportunity to participate in a structured savings program.
• Selecting 72 individuals (Adults and Youth) to participate in the savings program without requiring a formal contract of participation.
• Providing monthly deposits of $50 to participating heads of households and $25 per youth participant (up to three per household) to encourage savings.
• Establishing savings accounts that will accrue funds for two years or until a maximum of $5,000 is reached.
• Offering matching contributions of up to $1,000 per year for head-of-household deposits and $500 per year for youth deposits to incentivize saving.
• Ensuring participants had access to financial literacy and banking education, empowering them to make informed financial decisions.
• Allowing participants to opt out at any time and providing flexibility in fund access for urgent needs.
Additionally, GRHC expanded the initiative to include an additional 25 families under HUD's Opt-Out Savings Program, offering the opportunity to save without matching funds or youth accounts.

Through these efforts, GRHC ensures that affordable housing remains a platform for opportunity, stability, and community well-being. By integrating resident-driven policies, data-informed decision-making, and strong partnerships, GRHC reinforces its commitment to creating impactful housing solutions that empower families and strengthen neighborhoods.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Currently Implementing
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Currently Implementing
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Currently Implementing
d. Alternative Inspection Schedule (HCV)	Currently Implementing
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Currently Implementing
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Currently Implementing
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Plan to Implement in the Submission Year
b. Service Provision	Not Currently Implemented

c. Housing Development Programs	Not Currently Implemented

C. MTW Activities Plan that Grand Rapids Housing Commission Plans to Implement in the Submission Year or Is Currently Implementing

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

The GRHC will no longer require a third party to conduct rent reasonableness tests at PBV properties that the GRHC owns, manages, or controls. The GRHC will follow the rent reasonableness process used for all other properties and conduct the test using an online service. These tests will be subject to GRHC's voucher program quality control processes.

Requiring approval from a 3rd party increases costs, creates potential delays in the availability of needed housing units, and requires an additional expenditure for completion. By utilizing the same mechanism utilized by the tenant-based programs in the GRHC portfolio, this achieves greater cost-effectiveness in federal expenditures, improves administrative efficiencies, and reduces the response time for conducting rent reasonableness analysis. This activity contributes to

supporting the MTW statutory goal of reduce cost and achieve greater cost effectiveness in federal expenditures.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The GRHC now utilizes the HCV process for rent reasonableness for its PBV owned developments. This has reduced the administrative cost of procuring a third-party to perform a rent study. The GRHC not utilizes Affordablehousing.com to

perform rent reasonableness for all determinations.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload a description of the quality assurance method.

The GRHC will adhere to the quality control and quality assurance process utilized for the HCV program. The HCV Manager will perform quality assurance checks on 10% of the Rent Reasonableness calculations performed during the

fiscal year.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

The GRHC utilizes an online interface where staff enters information and the system provides data based on the HUD requirements that take into consideration various factors when determining rent comparability including:

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made
- Amenities, services, and utilities included in the rent

The GRHC may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that impose rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

GRHC RENT REASONABLENESS METHODOLOGY
The GRHC will primarily utilize online software to collect and maintain data on market rents in the GRHCs jurisdiction. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

The first step in preparation concerns the location characteristic. Location has the greatest impact on rent. Therefore, this system gives the greatest weight to location. To define location, the online software divides the Agency's jurisdiction into three rental market value areas. Each unit is to be assisted and each comparable unit is assigned to be in either a high, medium, or low rental market value location.

The online software assigns maximum value points to each HUD required characteristic. These value points represent the economic value for each characteristic. Each characteristic is assigned a value point level. Characteristics with higher levels have more impact on the actual rent. Level V has the highest number of potential value points. Level I have the lowest number of potential points. Each level has a value point range. The actual number of value points assigned to a characteristic is determined by the description of each characteristic in a particular unit. For example, for the quality characteristic, a unit with high quality will receive more value points than a unit with fair quality. In situations where the landlord submits comparable units for assessment, GRHC staff will enter the units into the online software for scoring. The

table attached provides value levels and point ranges.

This document is attached.

3.a. - Alternative Reexamination Schedule for Households (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

For PH Programs, the GRHC will decrease the frequency of reexaminations from annual to biennial for all families. The alternative reexamination schedule supports the MTW goal of creating activities that are cost effective; this is attained by a reduction in staff time and operational costs. It is expected, due to the reduction in staff time in completing recertifications, GRHC staff will be able to further assist families in their housing search and endeavors in self-sufficiency.

The GRHC will adhere to interim requirements per regulations and its administrative plan.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC has implemented a new biennial schedule effective January 1, 2025. The GRHC will recertify families once every two (2) years, based on the month their reexamination is effective. If on an odd month the certification will occur on

odd year and vice versa for even years.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)
3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households

(HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)
3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

The GRHC will complete interim recertifications for composition changes. It will also allow families to submit requests through its hardship policy to address circumstances that would require a change in rent calculation (i.e. medical expenses). The GRHC is committed to ensure that families/households are not negatively impacted under the alternative reexamination schedule.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

For HCV Programs, the GRHC will decrease the frequency of reexaminations from annual to biennial for all families in the HCV Portfolio. The alternative reexamination schedule supports the MTW goal of creating activities that are cost effective; this is attained by a reduction in staff time and operational costs. It is expected, due to the reduction in staff time in completing recertifications, GRHC staff will be able to further assist families in their housing search and endeavors in self-sufficiency.

The GRHC will adhere to interim requirements per regulations and its administrative plan.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity applies to all Tenant-based and Project-based vouchers.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.
The GRHC has implemented a new biennial schedule effective January 1, 2025. The GRHC will recertify families once every two (2) years, based on the month their reexamination is effective. If on an odd month the certification will occur on

odd year and vice versa for even years.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)
3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households

(HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)
3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

2 or more

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

The GRHC will complete interim recertifications for composition changes. It will also allow families to submit requests through its hardship policy to address circumstances that would require a change in rent calculation (i.e. medical expenses). The GRHC is committed to ensure that families/households are not negatively impacted under the alternative reexamination schedule.

3.c. - Self-Certification of Assets (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

The GRHC will allow participants to self-certify their assets up to $50,000. This waiver will improve cost effectiveness in reducing administrative burden while still maintaining the integrity of the rent calculation process. The Self-Certification of Assets activity supports the MTW and GRHC goal of creating activities that are cost effective. This is attained by a reduction in staff time when processing paperwork, which unfortunately is difficult to attain at times.

Staff spends onerous amounts of time verifying assets that routinely do not affect participants' rent portions. The GRHC estimates that verifying assets take per program participant (requesting and processing) approximately 20 minutes. By allowing families to self-certify, the GRHC estimates at minimum a saving of 1,400 hours or $52,332 in costs per year (calculation utilizes a newly hired HCV coordinator). It is expected, due to the reduction in staff time, GRHC staff will be

able to further assist families in their housing search and endeavors in self-sufficiency.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The GRHC modified its self-certification of assets form to reflect $50,000. It is now included as part of the recertification

document packages.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please state the dollar threshold for the self-certification of assets.

$50,000.

3.d. - Self-Certification of Assets (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

The GRHC will allow participants to self-certify their assets up to $50,000. This waiver will improve cost effectiveness in reducing administrative burden while still maintaining the integrity of the rent calculation process. The Self-Certification of Assets activity supports the MTW and GRHC goal of creating activities that are cost effective. This is attained by a reduction in staff time when processing paperwork, which unfortunately is difficult to attain at times.

Staff spend onerous amounts of time verifying assets that routinely do not affect participants' rent portions. sufficiency. The

GRHC estimates that verifying assets take per program participant (requesting and processing) approximately 20 minutes. By allowing families to self-certify, the GRHC estimates a saving of 1,400 hours or $52,332 in costs per year at a minimum

(calculation utilizes a newly hired HCV coordinator).

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC modified its self-certification of assets form to reflect $50,000. It is now included as part of the recertification

document packages.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please state the dollar threshold for the self-certification of assets.

$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The GRHC in its effort to increase and support housing choice, will implement a vacancy claim program. This activity addresses the MTW goal of housing choice and the GRHC goal of incentivizing landlords to participate in its programs. By increasing the number of landlords participating in the tenant-based programs, will provide more choices in housing for participants and improve the success rate of participants leasing up. The GRHC will offer a vacancy loss payment worth one (1) month's contract rent, payable upon execution of a new HAP contract with the GRHC. If the unit is vacant for less than a full month, the payments will be prorated based on the number of days the unit is vacant.

This activity's purpose is to incentivize and increase retention of current participating landlords and attract new landlords into the tenant-based programs. These incentives may minimize the risk of monetary loss when a unit is vacant, influence landlords to work with applicants/clients searching for housing, help landlords become more willing to hold units for voucher participants, reduce the lease up time and reduce the GRHC large waiting list. It is expected as units become leased, increases in utilization and administrative fees will occur allowing for future programming in support of

self-sufficiency for participants.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of

assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC has marketed the availability of the vacancy loss payments to its landlords as part of the landlord incentive

program.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?

To all units

What is the maximum payment that can be made to a landlord under this policy?

Up to one month of unit rent.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

$0

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The GRHC in efforts to incentivize and increase landlord participation in its tenant-based assistance programs will further expand its Landlord Incentive program. These incentives assist in the MTW and GRHC goals of increasing housing choice for participants and increasing landlord participation. The incentives are as follows:
• New landlords receive $1,000 dollars after an executed HAP contract.
• Returning landlords that have not signed a HAP contract for more than 12 months; receive $1,000 after an executed HAP contract.
• Current participating landlords, receive $500 per new unit that has an executed HAP contract, up to a three (3) units per year maximum.
• A referral bonus of $200 to current participating landlords for each new landlord that executes a HAP contract. Limited to up to 5 Referrals.
• Non-monetary incentives including:
o Landlord portal
o Landlord workshops and outreach – for current and new landlords.
o Streamlining the inspection process - using reminder software specific automations.

o A landlord liaison - streamlining the landlord’s on-boarding process and serve as a single point of contact.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC has marketed the availability of the landlord incentive program. We have had major success in the use of the incentives to attract new landlords and units to the HCV program. The GRHC will continue to incentivize landlords to

onboard new units and other landlords to participate in the HCV program.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?

To all units

What is the maximum payment that can be made to a landlord under this policy?

Up to $3,500

How many payments were issued under this policy in the most recently completed PHA fiscal year?

57

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

$49,500

5.a. - Pre-Qualifying Unit Inspections (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The GRHC will offer pre-qualifying inspections for units in its jurisdiction. Passing pre-qualifying inspections will be valid for 90 days from the passed inspection date. Participants will be able to request an interim inspection after moving in. The goal of these inspections is to lessen the time it takes for a voucher holder to move into a unit and encourage participation from new landlords. New landlords can understand the current HUD inspection standards through a pre-qualifying inspection, quickly make their repairs, and then be ready for a voucher holder tenant. The voucher holder will be able to move into the unit faster due to not waiting on an inspection, which may fail the first time and take more time to pass a re-inspection. Additionally, landlords will decrease their vacancy time and income lost.
The pre-qualifying unit inspections are part of a larger landlord incentive initiative to increase the supply of affordable housing and maintaining a positive relationship with landlords. Pre-qualifying unit inspections will shorten the timeframe landlords must wait during the Request for Tenancy Approval and normal inspection process (a deterrent for some

landlords) and ensure more quality units are available to voucher holders.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC continues to offer this option to landlords in its HCV Program. The GRHC will continue to market to the

availability of this option to landlords.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

5.c. - Third-Party Requirement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The GRHC will no longer require a third party to conduct inspections at PBV properties that the GRHC has an interest in. The GRHC will follow the inspection process utilizing the current HUD inspection method that is used for all other properties (HQS or NSPIRE). The inspections will be subject to GRHC's voucher program quality control process. Participants will also be able to request an interim inspection or review by a supervisor at any time if they feel an inspection need was not met.
Requiring approval from a third party increases administrative costs, due to the need to contract an external party. Conducting these inspections in house will achieve greater cost-effectiveness in federal expenditures, improve administrative efficiencies, eliminate confusion for participants, and improve the response time for conducting inspections. This waiver contributes to our larger initiative of promoting project-based voucher efficiency by no longer requiring third

parties to conduct rent reasonableness tests and inspections for PBV properties that the GRHC has an interest in.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The Grand Rapids Housing Commission (GRHC) has transitioned the inspection of 636 Project-Based Voucher (PBV) units to be conducted by GRHC Housing Choice Voucher (HCV) Inspectors. Previously, these inspections incurred a cost of approximately $40 per unit, resulting in an annual expenditure of up to $25,440.

By utilizing an in-house GRHC inspector, whose hourly rate is $33 (based on the newest inspector), and who can complete an inspection in approximately 30 minutes, the cost per inspection is reduced to $16.50. This equates to a total

annual cost of $10,494 for 636 inspections, yielding an annual savings of $14,946.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method
The GRHC will adhere to the quality control and quality assurance process utilized for the HCV program. The HCV Manager/Supervisor will perform quality assurance inspections on 10% of the inspections performed during the current

fiscal year.

No document is attached.

5.d. - Alternative Inspection Schedule (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
Through the combined MTW activities 4.a. Vacancy Loss Payment, and 4.c. Other Landlord incentives, the GRHC will implement activities that encourage owner participation in the HCV program. The GRHC will inspect assisted units of eligible households once every two years for landlords that have passed their initial inspection and continue to pass their biennial inspections. Eligible households and participating landlords may request interim (special/complaint) inspection at any time during the term of the HAP contract.

The GRHC will comply with HQS inspection standards as found at 24 CFR 982.401. The GRHC will inspect assisted units at any time for health and safety, as well as accessibility purposes. The goal of this activity is to increase the number of participating owners, expand housing opportunities for participants, and retain landlord participation in the HCV program. This activity combined with HAP direct deposits, Pre-HQS inspections, vacancy loss payments, and bonus payments are intended to increase and retain landlord participation. This activity will also reduce operational costs by reducing the

amount of HQS inspections to occur per year by 50%.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC is still in the process of implementing this activity due to software inflexibilities around inspection scheduling with the passing/fail variable. The GRHC is manually scheduling units that have passed inspection to be reinspected on a

biennial basis.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.a. - Increase PBV Program Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative
The GRHC will increase the PBV Program Cap up to 50% of its housing choice authorized units for project-based vouchers. It is our goal to leverage LIHTC awards and work with for-profit and non-profit developers, local units of government and housing providers to meet the community's demand for affordable housing and avoid displacing residents. Currently, the county's projected need for 2025 is 9,000 units of which 50% are needed for low-income

households. This activity will expand housing choice for families in GRHC Programs by adding additional subsidized units.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The GRHC has awarded 126 Project based vouchers in the last fiscal year. It will continue to partner with nonprofit

developers to meet the housing demand in its jurisdiction.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The GRHC will increase the PBV Project Cap up to 100% of the project units. It is our goal to leverage LIHTC awards and work with for-profit and non-profit developers, local units of government, and housing providers to meet the community's demand for affordable housing and avoid displacing residents. Currently, the county's projected need for 2025 is 9,000 units of which 50% are needed for low-income households. This will support the GHRC and MTW goal of increasing

housing choice for families that are assisted.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.
The GRHC in its last RFP for PBV increased the percentage of vouchers per project to be the lesser of 35 vouchers or 60% of the total units in a project. The GRHC will continue to analyze the current need of the local community and adjust its RFP to meet that need.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The GRHC will utilize the elimination of PBV Selection Process for PHA-owned Projects without improvement, development, or replacement in order to reduce costs associated with the RFP process. This process requires a significant amount of staff time to prepare the RFP, receive and organize proposals for review, score proposals, notify developers of the outcome, track awards until execution of contract, and 3rd party costs associated with their efforts. This would allow the GRHC to award vouchers without the RFP to units in the GRHC's portfolio that qualify for PBV after conducting a Subsidy Layering Review, ensuring the property is compliant with HUD's site selection requirements, and conduct HQS inspections of the units. This waiver would increase cash flow stability for the project brought about by PBVs. This will support the GHRC and MTW goals of increasing housing choice for families that are assisted by increasing availability and choice of units.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The Grand Rapids Housing Commission (GRHC) has awarded 24 Project-Based Vouchers (PBVs) to Hope Community, a development in which GRHC has a vested interest. This allocation enhances operational efficiency by consolidating all units under a single Housing Assistance Payment (HAP) contract, rather than managing 24 individual contracts. This approach streamlines administrative processes, eliminates various rental requests, and reduces paperwork.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
The severe shortage of affordable rental homes in our jurisdiction has substantially limited housing choice for low-income families. Long waiting lists for assisted units signify intense demand, yet development of new affordable properties rarely keeps pace with need. To help close this gap, our agency will tap into MTW flexibility to boost housing supply and mobility through expanding housing choice. To help address this pressing issue limiting housing choice, the GRHC will utilize MTW

flexibilities to allow manufactured homes and shared housing developments to receive project-based vouchers. This flexibility supports the GRHC's commitment to actualizing housing choice for all families in our community, regardless of income level or background. By targeting supply, leveraging markets and incentivizing participation, our MTW strategies aim to open doors to neighborhoods with opportunities too long denied to the households we serve. The flexibility to innovatively address inadequate affordable inventory provides a meaningful lever for expanding access, equity and

inclusion throughout the jurisdiction.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

The Grand Rapids Housing Commission (GRHC) has included these unit types in its Fall 2024 Request for Proposals (RFP) for Project-Based Vouchers (PBVs). As a result, GRHC has awarded PBVs to two projects planning to develop

shared housing units.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?

30

How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?

50

How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?

0

9.g. - Increase PBV Rent to Owner (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

The GRHC would like to use HUD's published Fair Market Rents (FMR) to determine contract rent increases on an annual basis for PBVs utilized at its housing developments. This would eliminate the need to procure costly rent comparability studies to increase contract rents. FMRs and utility allowances identified by HUD and a third party have been providing a baseline for tenant-based housing for years and is utilized for HUD funded programs. Due to the cost of rent comparability studies, the GRHC must delay engaging a contractor over a span of five (5) years in order to recoup its capital outlay and

thus strangle cash flows when they could be spent making improvements to the developments. This activity will support the GRHC in achieving the MTW goal of reducing cost and achieving greater cost effectiveness in federal expenditures. A

Rent Reasonableness Test would also be employed to meet requirements of the Safe Harbor for this MTW Waiver.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
The Grand Rapids Housing Commission (GRHC) has transitioned to utilizing the Fair Market Rent (FMR) standard and will no longer contract out for rent studies on properties where it is not applicable. As rent studies are conducted on a five-year

basis, this shift is expected to generate cost savings in the coming years.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

17.a. - Rental Subsidy Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative
Lack of stable housing and supports after incarceration has contributed to high rates of homelessness and recidivism among returning citizens in our community. To address this pressing issue, our agency will utilize MTW flexibility to implement a program in partnership with a local organization that provides services to returning citizens. This MTW activity will provide flexible housing financial assistance and targeted wraparound services for returning citizens through a contracted partnership. Our agency will supply funding for rental subsidies, security deposits, and utilities costs to the partner, which will manage the housing assistance paired with reentry navigation, counseling, job training programs and transitional case management they already provide.
The goal of this MTW innovation is to improve reintegration outcomes by ensuring consistent housing stability in the crucial period following release from incarceration. Research shows former inmates who secure affordable homes and supports have higher employment levels, reduced recidivism and improved family reunification. This initiative aims to break the cycle of incarceration fed by systemic barriers. The housing stability and service bundle made possible through our MTW flexibility represents a key piece of this comprehensive effort to lower recidivism and homelessness rates. By braiding

subsidy funds and support programming, we hope to open doors to new beginnings.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions (i.e., applicants) only

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Returning Citizens from Incarceration

Does the MTW activity apply to all public housing developments?

The MTW activity applies to specific developments

Which developments participate in the MTW activity?

This activity will only apply to the HCV Program.

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

This activity will only apply to the HCV Program.

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.
Due to funding constraints, the implementation of this activity has been delayed. The Grand Rapids Housing Commission

anticipates proceeding with implementation in the upcoming fiscal year, contingent upon the availability of funding.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity apply to all LNT units/properties?

The MTW activity applies to specific units/properties

Describe which LNT units/properties participate in the MTW activity?

This activity will only apply to tenant-based assistance and not to any development or unit.

Table 17.a.1 - For each third-party partner, please complete the information in the following table.

Third-party Partner	Type of Services the Partner Provides	# of Units Allocated to that Partner for the Fiscal Year

D.	Safe Harbor Waivers.
D.1	**Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?** No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).
E.1	**Agency-Specific Waiver(s) for HUD Approval:** The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I. In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable. For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement. **Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?** No

E.2	**Agency-Specific Waiver(s) for which HUD Approval has been Received:** **Does the MTW agency have any approved Agency-Specific Waivers?** No

F.	**Public Housing Operating Subsidy Grant Reporting.**
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2023	$574,909	$574,909	$0	2023-12-30
2024	$568,921	$568,921	$0	2024-12-31
2025	$517,900	$86,316	$431,584	2025-12-31

G.	MTW Statutory Requirements.
G.1	**75% Very Low Income – Local, Non-Traditional.** HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.

Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	**0**

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.

Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?
Yes

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?

G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix'' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	**0**

H.	Public Comment

Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

I.	Evaluations.

Yes - This table lists evaluations of Grand Rapids Housing Commission's MTW activities, including the names of evaluators and available reports

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
Asset Building -Opt-Out Savings - 25 families have been selected to opt out of a savings program. Each family is deposited $50 a month for 2 years. the purpose of the study is to measure enrollment, eviction prevention, and growth of assets.	Abt Associates - Judy Geyer - Judy_Geyer@abtassoc.com	2 years from the date of enrollment into the program.	No reports are available at this point in time.

ATTACHMENT K

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/25

	Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Revenues:											
Management and Bookkeeping Fees	-	-	-	-	-	-	-	-	-	-	
HUD Grants	472,589	-	-	159,663	-	-	-	1,100,000	-	48,000	-
Vacancies	(25,000)	(1,200)	(6,000)	-	(2,000)	(28,212)	(6,410)	(16,000)	(1,000)	(20,000)	(2,000)
Tenant Assistance Payment	-	300,000	189,000	-	881,245	900,000	425,000	-	442,000	-	105,000
Administrative Fee	-	-	-	-	-	-	-	-	-	-	-
Dwelling Rental	632,400	436,000	217,000	-	764,485	846,000	340,000	700,000	185,000	24,000	75,000
Excess Utilities	2,000	150	-	-	1,900	-	-	-	-	-	-
Investment Income-unrestricted	-	-	-	-	-	-	-	-	-	-	-
Investment income-Residual Rec	-	-	-	-	-	-	-	850	-	-	-
Investment Income-Repl Reserve	-	-	-	-	-	-	-	850	-	-	-
Fraud Recovery Funds	-	-	-	-	-	-	-	-	-	-	-
FSS Escrow Forfeitures	-	-	-	-	-	-	-	-	-	-	-
Other Income	20,000	15,000	10,000	-	5,000	6,316	1,240	8,000	2,500	1,000,000	2,000
Laundry Receipts	9,000	-	-	-	8,500	12,978	5,740	7,000	675	-	-
Vending Income	-	-	-	-	-	850	-	-	-	-	-
Donations	-	-	-	-	-	-	-	-	-	-	-
Interest on General Funds	-	-	-	-	-	-	100	-	-	-	-
Total Revenues	1,110,989	749,950	410,000	159,663	1,659,130	1,737,932	765,670	1,800,700	629,175	1,052,000	180,000
Expenses:											
Administrative:											
Salaries	205,899	87,879	12,885	-	186,810	121,701	50,693	145,419	45,492	5,533	22,161
Compensated Absences	-	-	-	-	-	-	-	-	-	-	-
Legal Fees	300	300	1,000	-	1,000	4,000	1,500	1,800	200	200	500
Consulting (non-legal)	2,500	-	-	-	-	-	-	-	-	-	-
Training	4,300	1,500	1,000	-	4,000	1,000	600	4,300	2,000	150	150
Travel	5,000	1,500	1,400	-	4,000	3,000	1,100	4,500	2,000	250	300
HR Onboarding	250	150	70	-	200	200	70	225	100	10	30
Auditing Fees	2,300	5,100	300	-	1,500	1,500	4,700	16,000	4,600	200	250
Employee Benefits	62,467	27,263	5,143	-	50,257	37,370	15,688	48,475	15,136	1,372	6,801
Tuition Reimbursement											
Bank Fees	-	2,207	917	-	2,732	-	2,025	4,040	2,340	-	-
Office Supplies	5,000	1,500	1,000	-	2,800	4,000	1,800	2,800	900	100	200
Telephone Charges	7,500	2,500	2,500	-	5,000	6,000	3,500	8,700	2,500	250	300

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/25

		Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
	Advertising	550	150	200	-	500	1,750	500	550	250	20	-
	Communications	1,050	250	150		700	700	300	825	250	-	-
	Dues/Memberships/Subscriptions	1,800	500	600		1,600	1,200	600	1,800	800	160	150
	Eviction/Collection Costs	10,000	1,000	10,000	-	4,000	4,000	1,800	5,000	1,000	500	1,000
	IT Related	114,604	20,627	26,253		300,213	206,713	211,062	69,349	40,929	1,420	1,873
	Copy Machine	420	420	1,250	-	420	300	150	420	420	-	-
	Portable Admin Fee	-	-	-	-	-	-	-	-	-	-	-
	Rent Free Unit	-	-	-	-	-	-	-	11,724	-	-	-
	Postage	1,500	1,250	300	-	1,800	2,000	800	1,500	300	150	200
	Other Sundry	1,200	1,000	2,400	-	3,000	1,200	1,500	3,000	500	3,500	1,775
	Management Fee	121,260	99,408	-	-	87,098	85,650	21,120	90,600	31,995	6,450	14,263
	Asset Management Fee	-	-	-	-	-	-	-	-	-	-	-
	Bookkeeping Fee	16,920	-	-	-	-	-	-	-	-	900	-
Total Administrative		564,820	254,504	67,368	-	657,630	482,284	319,508	421,027	151,712	21,165	49,953
Tenant Services:												
	Tenant Services - Salaries	73,125	28,476	8,254	108,674	79,092	58,746	25,295	75,081	23,003	825	4,173
	Tenant Services- Benefits	23,932	10,221	2,253	50,430	23,429	17,128	7,373	23,435	8,535	225	1,411
	Tenant Services - RA Stipend			2,400		2,400	1,680	720	2,400			
	Tenant Services-Other	3,000	1,500	2,000	-	2,000	4,000	2,000	3,000	2,500	100	300
	Protective Services	153,500	19,000	5,000		25,500	26,000	11,000	31,000	9,200		
Total Tenant Services		253,557	59,197	19,907	159,104	132,421	107,554	46,388	134,916	43,238	1,150	5,884
Utilities:												
	Water	73,125	60,000	35,000		50,000	35,000	17,500	13,000	15,000	8,500	12,000
	Electricity	112,000	10,000	28,000		92,000	80,000	40,000	120,000	45,000	1,750	200
	Gas	52,000	3,200	21,000		49,000	55,000	30,000	80,000	23,000	3,000	700
	Internet	3,200	3,000	3,700		4,400	2,650	1,200	4,600	3,850	110	150
Total Utilities		240,325	76,200	87,700	-	195,400	172,650	88,700	217,600	86,850	13,360	13,050
Maintenance:												
	Maintenance Labor	133,644	86,026	22,345		107,844	89,485	38,351	114,654	30,693	-	21,506
	Maintenance Materials	20,000	14,000	5,000		22,000	10,000	5,500	40,000	7,000	6,000	2,500
	Cleaning Supplies	7,500	2,000	1,000		2,500	2,500	1,000	5,000	800	200	150
	Painting Supplies	4,500	2,000	3,000		3,000	2,000	1,000	4,500	500	500	500
	Appliances	15,000	10,000	10,000		8,000	5,000	5,000	10,000	10,000	1,000	600

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/25

	Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Other Supplies	1,000	1,200	1,000		1,500	500	500	1,500	500	-	125
Inspections	13,000	500	1,000		500	4,938	2,400	6,000	400	6,000	1,500
Exterminating	35,000	3,000	1,500		25,000	30,000	13,324	35,000	2,200	1,000	1,250
Heating & Cooling Repairs	30,000	38,500	7,500		27,000	18,000	10,000	65,000	15,000	4,000	2,500
Elevator Maintenance	10,000	1,000	-		5,000	12,000	10,000	10,000	4,200	-	-
Lawn Care	7,000	27,000	8,000		9,000	15,000	6,000	11,000	14,000	5,000	-
Snow Plowing	6,000	10,000	2,000		6,000	6,000	3,000	7,500	4,500	-	-
Electrical Repairs	3,000	1,000	500		18,000	1,500	1,200	23,000	800	1,000	500
Carpet/Tile Replacement	150,000	6,500	26,000		40,000	60,000	12,296	50,000	10,000	-	7,400
Plumbing Repairs	15,000	20,000	2,500		60,000	8,000	7,085	25,000	5,000	4,500	2,000
Other Contract Costs	70,000	43,000	2,400	-	38,000	10,000	5,000	80,000	12,000	8,500	12,500
Janitorial contracts	1,000	-	-		-	-	-	-	-	-	-
Trash Removal	30,000	30,000	10,000		12,000	8,000	4,500	18,000	8,500	-	-
Maintenance Travel	800	350	100		800	400	500	4,000	250	100	-
Maintenance Benefits	55,780	31,284	9,307		39,137	28,842	12,361	39,841	12,969	-	7,821
Painting	19,000	10,000	5,000		17,000	12,000	5,000	26,000	2,000	1,000	3,700
Total Maintenance	627,224	337,360	118,152	-	442,281	324,165	144,017	575,995	141,312	38,800	64,552
General Expenses:											
Insurance	59,000	87,000	17,000		56,000	42,000	23,000	70,000	38,000	11,000	12,500
Mortgage Insurance	-	-	-		-	-	-	18,250	-	-	-
Workers Comp. Insurance	1,429	948	463	559	1,292	904	401	1,420	647	48	201
PILOT	39,728	36,280	13,300		57,539	67,600	25,250	-	10,200	1,075	6,210
Casualty Loss	-	-	-		-	-	-	-	-	-	-
Bad Debt-Tenants	15,000	5,000	5,000		6,000	11,498	7,492	4,500	2,000	900	3,000
Interest-Mortgage	-	143,686	-		55,933	88,123	25,884	146,832	63,482	-	-
Other General Expense	-	-	-		-	-	-	-	-	-	-
Housing Assistance	-	-	-		-	-	-	-	-	-	-
Housing Assistance: HO	-	-	-		-	-	-	-	-	-	-
Housing Assistance: NED	-	-	-		-	-	-	-	-	-	-
Housing Assistance: Enhanced	-	-	-		-	-	-	-	-	-	-
FSS Escrow	1,000	-	-		-	-	-	-	-	-	4,000
Depreciation	11,163	82,113	56,312		84,614	228,195	95,646	120,352	112,879	42,084	23,957
Amortization	-	-	-		-	-	-	5,561	-	-	-
Total General Expenses	127,320	355,027	92,075	559	261,377	438,320	177,673	366,915	227,208	55,107	49,868

GRAND RAPIDS HOUSING COMMISSION - Proposed Budget - Fiscal Year Ending 6/30/25

	Adams	Campau	Hope	Hope Support	Leonard	Mt Mercy I	Mt Mercy II	Ransom	Sheldon	Scattered LIPH	Scattered RAD
Total Expenses	**1,813,246**	**1,082,288**	**385,202**	**159,663**	**1,689,109**	**1,524,973**	**776,287**	**1,716,453**	**650,319**	**129,582**	**183,307**
Net Income (Loss)	**(702,257)**	**(332,338)**	**24,798**	**0**	**(29,979)**	**212,959**	**(10,617)**	**84,247**	**(21,144)**	**922,418**	**(3,307)**
Cash flow reconciliation:											
Add: Depreciation expense	11,163	82,113	56,312	-	84,614	228,195	95,646	125,913	112,879	42,084	23,957
Add: Paid from escrow or reserve		215,000			100,000	-	-	30,000		-	-
Add/Less: Accrued Interest payable to GRHC		143,686									
Add: Capital Fund operations	391,081										
Add: Principal pmts mortgage rec											
Add: Anticipated Adjustments	-	-	-								
Add: Cash Surplus from Prior Years	325,000	-									
Less: Mortgage principal payments					(47,602)	(92,882)	(27,331)	(119,719)	(29,989)		
Less: Replacement reserve deposits							-	(58,110)	-		(19,992)
Less: Voluntary reserve deposits		(90,000)	-		(25,000)	(9,996)	(3,000)		(24,000)		
Less: Capital items from operations	-	-	-		-	-	-	-	-		
Less: IT Capital items from operations	-		-		-	-	-	-	-		
Add/Less: MTW Transfer											
Net estimated cash flow	**24,987**	**18,461**	**81,110**	**0**	**82,033**	**338,276**	**54,698**	**62,331**	**37,746**	**964,502**	**658**

GRAND RAPIDS HOUSIN

	Scattered H.O.	Vouchers Admin	Vouchers HAP	Housing Barrier Fund	Aim To Save Asset Bldg	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office
Revenues:											
Management and Bookkeeping Fees		-	-					-	-	-	1,685,570
HUD Grants	-	-	29,961,484			2,027,376	380,016	121,080	480,912	502,240	-
Vacancies	-	-	-					-	-	-	-
Tenant Assistance Payment	-	-	-					-	-	-	-
Administrative Fee	-	2,758,033	-			213,141	61,243	13,807	69,258	-	-
Dwelling Rental	-	-	-					-	-	-	-
Excess Utilities	-	-	-					-	-	-	-
Investment Income-unrestricted	-	-						-	-	-	83,835
Investment income-Residual Rec	-	-						-	-	-	-
Investment Income-Repl Reserve	-	-						-	-	-	-
Fraud Recovery Funds	-	25,000	25,000					-	-	-	-
FSS Escrow Forfeitures	-	50,000	-					-	-	-	-
Other Income	70,000	-	-					-	-	-	200,000
Laundry Receipts	-	-	-					-	-	-	-
Vending Income	-	-	-					-	-	-	-
Donations	-	-	-	-	5,000			-	-	-	-
Interest on General Funds	1,100	-	-					-	-	-	-
Total Revenues	71,100	2,833,033	29,986,484	-	5,000	2,240,517	441,259	134,887	550,170	502,240	1,969,405
Expenses:											
Administrative:											
Salaries	-	1,315,328	-			64,273	20,920	5,043	15,378	-	1,164,579
Compensated Absences	-	-	-			-	-	-	-	-	-
Legal Fees	-	5,000	-			500	-	50	100	-	15,000
Consulting (non-legal)	-	5,000	-			1,000	-	900	200	-	3,000
Training	-	20,000	-			1,700	-	50	400	10,000	25,000
Travel	-	20,000	-			1,800	-	50	350	5,000	43,800
HR Onboarding	-	1,500	-			100	-	-	45	-	8,000
Auditing Fees	-	41,000	-			2,100	-	200	1,100	-	14,000
Employee Benefits	-	450,702	-			21,338	6,921	1,641	4,948	-	317,300
Tuition Reimbursement											10,000
Bank Fees	-	-	-			-	-	-	-	-	22,568
Office Supplies	-	23,000	-			1,000	-	100	450	625	15,000
Telephone Charges	-	6,000	-			250	-	30	100	-	10,000

GRAND RAPIDS HOUSIN

		Scattered H.O.	Vouchers Admin	Vouchers HAP	Housing Barrier Fund	Aim To Save Asset Bldg	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office
	Advertising	-	4,000	-			200	-	-	90	-	1,320
	Communications	-	5,000	-			1,350	225	100	150	-	20,000
	Dues/Memberships/Subscriptions	-	12,000	-			700	-	70	400		36,000
	Eviction/Collection Costs	-	-	-			-	-	-	-	-	-
	IT Related	-	220,000	-			11,487	-	1,059	5,760		136,389
	Copy Machine	-	1,900	-			100	-	11	50	-	1,500
	Portable Admin Fee	-	10,500	-				-	-	-	-	-
	Rent Free Unit	-	-	-				-	-	-	-	-
	Postage	-	30,000	-			1,000	-	150	700	-	7,500
	Other Sundry	500	10,000	-		92,600	1,500	-	175	250	-	35,000
	Management Fee	-	500,388	-			35,568	6,048	2,304	12,384	-	-
	Asset Management Fee	-	-	-				-	-	-	-	-
	Bookkeeping Fee	-	312,743	-			22,230	3,780	1,440	7,740	-	-
Total Administrative		500	2,994,061	-	-	92,600	168,196	37,894	13,373	50,595	15,625	1,885,956
Tenant Services:												
	Tenant Services - Salaries	-	-	-			-	-	-	-	361,415	-
	Tenant Services- Benefits	-	-	-			-	-	-	-	124,000	-
	Tenant Services - RA Stipend											
	Tenant Services-Other	-	50,000	-	50,000		-	2,000	-	-	-	-
	Protective Services											
Total Tenant Services		-	50,000	-	50,000	-	-	2,000	-	-	485,415	-
Utilities:												
	Water	500	6,000	-			-	-	-	-	-	-
	Electricity	700	7,600	-			-	-	-	-	-	-
	Gas	2,700	8,500	-			-	-	-	-		-
	Internet	-	26,000	-			1,300	-	10	43		1,850
Total Utilities		3,900	48,100	-	-	-	1,300	-	10	43	-	1,850
Maintenance:												
	Maintenance Labor	-	-	-			-	-	-	-	-	-
	Maintenance Materials	500	50	-			-	-	-	-	-	100
	Cleaning Supplies	-	100	-			-	-	-	-	-	-
	Painting Supplies	-	25	-			-	-	-	-		-
	Appliances	-	-	-			-	-	-	-	-	-

GRAND RAPIDS HOUSIN

		Scattered H.O.	Vouchers Admin	Vouchers HAP	Housing Barrier Fund	Aim To Save Asset Bldg	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office
	Other Supplies	-	3,500	-			-	-	-	-	-	-
	Inspections	700	12,000	-			150	-	-	-		-
	Exterminating	-	250	-			-	-	-	-	-	-
	Heating & Cooling Repairs	1,100	1,000	-			50	-	-	-	-	-
	Elevator Maintenance	-	-	-			-	-	-	-	-	-
	Lawn Care	350	10,000	-			-	-	-	-	-	-
	Snow Plowing	-	1,500	-			-	-	-	-	-	-
	Electrical Repairs	-	-	-			-	-	-	-	-	-
	Carpet/Tile Replacement	-	-	-			-	-	-	-	-	-
	Plumbing Repairs	500	-	-			-	-	-	-	-	-
	Other Contract Costs	1,000	6,500	-			-	-	-	-	-	-
	Janitorial contracts	-	6,000	-			200	-	-	-	-	-
	Trash Removal	-	-	-			-	-	-	-	-	-
	Maintenance Travel	150	-	-			-	-	-	-	-	-
	Maintenance Benefits	-	-	-			-	-	-	-	-	-
	Painting	-	-	-			20	-	-	-	-	-
Total Maintenance		4,300	40,925	-	-	-	420	-	-	-	-	100
General Expenses:												
	Insurance	2,000	-	-			-	-	-	-	-	6,100
	Mortgage Insurance	-	-	-			-	-	-	-	-	-
	Workers Comp. Insurance	-	4,899	-			559	-	16	80	1,200	3,515
	PILOT	-	-	-			-	-	-	-	-	-
	Casualty Loss	-	-				-	-	-	-	-	-
	Bad Debt-Tenants	-	-	-			-	-	-	-	-	-
	Interest-Mortgage	-	-	-			-	-	-	-	-	-
	Other General Expense	-	1,000				-	-	-	-	-	-
	Housing Assistance	-	-	28,662,196			2,027,376	380,016	121,080	480,912	-	-
	Housing Assistance: HO	-	-	206,208			-	-	-	-	-	-
	Housing Assistance: NED	-	-	859,200			-	-	-	-	-	-
	Housing Assistance: Enhanced	-	-	128,880			-	-	-	-	-	-
	FSS Escrow	-	-	105,000			-	-	-	-	-	-
	Depreciation	3,507	43,384	-			884	-	85	505	-	39,601
	Amortization	-	-	-				-	-	-	-	-
Total General Expenses		5,507	49,283	29,961,484	-	-	2,028,819	380,016	121,181	481,497	1,200	49,216

GRAND RAPIDS HOUSIN

	Scattered H.O.	Vouchers Admin	Vouchers HAP	Housing Barrier Fund	Aim To Save Asset Bldg	Mainstream	EHV	Mod Rehab I	Mod Rehab 4	ROSS FSS	Central Office
Total Expenses	**14,207**	**3,182,368**	**29,961,484**	**50,000**	**92,600**	**2,198,735**	**419,910**	**134,564**	**532,135**	**502,240**	**1,937,122**
Net Income (Loss)	**56,893**	**(349,335)**	**25,000**	**(50,000)**	**(87,600)**	**41,783**	**21,349**	**323**	**18,035**	**-**	**32,283**
Cash flow reconciliation:											
Add: Depreciation expense	3,507	43,384	-			884	-	85	505	-	39,601
Add: Paid from escrow or reserve											
Add/Less: Accrued Interest payable to GRHC											(83,835)
Add: Capital Fund operations											50,000
Add: Principal pmts mortgage rec	-										
Add: Anticipated Adjustments		350,000				-	-	-	-		-
Add: Cash Surplus from Prior Years											
Less: Mortgage principal payments											
Less: Replacement reserve deposits											
Less: Voluntary reserve deposits											
Less: Capital items from operations											-
Less: IT Capital items from operations											-
Add/Less: MTW Transfer			-	50,000	87,600						
Net estimated cash flow	**60,400**	**44,049**	**25,000**	**-**	**-**	**42,667**	**21,349**	**408**	**18,540**	**-**	**38,049**

GRAND RAPIDS HOUSIN

		Elim.	Totals
Revenues:			
Management and Bookkeeping Fees		(1,480,287)	205,282
HUD Grants			35,253,360
Vacancies			(107,822)
Tenant Assistance Payment		(3,242,245)	-
Administrative Fee			3,115,481
Dwelling Rental			4,219,885
Excess Utilities			4,050
Investment Income-unrestricted			83,835
Investment income-Residual Rec			850
Investment Income-Repl Reserve			850
Fraud Recovery Funds			50,000
FSS Escrow Forfeitures			50,000
Other Income			1,340,056
Laundry Receipts			43,893
Vending Income			850
Donations			5,000
Interest on General Funds			1,200
Total Revenues		(4,722,532)	44,266,770
Expenses:			
Administrative:			
	Salaries		3,469,993
	Compensated Absences		-
	Legal Fees		31,450
	Consulting (non-legal)		12,600
	Training		76,150
	Travel		94,050
	HR Onboarding		10,950
	Auditing Fees		94,850
	Employee Benefits		1,072,822
	Tuition Reimbursement		10,000
	Bank Fees		36,829
	Office Supplies		60,275
	Telephone Charges		55,130

GRAND RAPIDS HOUSIN

		Elim.	Totals
	Advertising		10,080
	Communications		31,050
	Dues/Memberships/Subscriptions		58,380
	Eviction/Collection Costs		38,300
	IT Related		1,367,738
	Copy Machine		7,361
	Portable Admin Fee		10,500
	Rent Free Unit		11,724
	Postage		49,150
	Other Sundry		159,100
	Management Fee	(1,114,534.92)	-
	Asset Management Fee	-	-
	Bookkeeping Fee	(365,752.50)	-
Total Administrative		(1,480,287)	6,768,482
Tenant Services:			
	Tenant Services - Salaries		846,159
	Tenant Services- Benefits		292,372
	Tenant Services - RA Stipend		
	Tenant Services-Other		122,400
	Protective Services		280,200
Total Tenant Services		-	1,541,131
Utilities:			
	Water		325,625
	Electricity		537,250
	Gas		328,100
	Internet		56,063
Total Utilities		-	1,247,038
Maintenance:			
	Maintenance Labor		644,548
	Maintenance Materials		132,650
	Cleaning Supplies		22,750
	Painting Supplies		21,525
	Appliances		74,600

GRAND RAPIDS HOUSIN

		Elim.	Totals
	Other Supplies		11,325
	Inspections		49,088
	Exterminating		147,524
	Heating & Cooling Repairs		219,650
	Elevator Maintenance		52,200
	Lawn Care		112,350
	Snow Plowing		46,500
	Electrical Repairs		50,500
	Carpet/Tile Replacement		362,196
	Plumbing Repairs		149,585
	Other Contract Costs		288,900
	Janitorial contracts		7,200
	Trash Removal		121,000
	Maintenance Travel		7,450
	Maintenance Benefits		237,342
	Painting		100,720
Total Maintenance		-	2,859,603
General Expenses:			
	Insurance		423,600
	Mortgage Insurance		18,250
	Workers Comp. Insurance		18,580
	PILOT		257,181
	Casualty Loss		-
	Bad Debt-Tenants		60,390
	Interest-Mortgage		523,940
	Other General Expense		1,000
	Housing Assistance	(3,242,245)	28,429,335
	Housing Assistance: HO		206,208
	Housing Assistance: NED		859,200
	Housing Assistance: Enhanced		128,880
	FSS Escrow		110,000
	Depreciation		945,281
	Amortization		5,561
Total General Expenses		(3,242,245)	31,987,406

GRAND RAPIDS HOUSIN

	Elim.	Totals
Total Expenses	**(4,722,532)**	**44,403,660**
Net Income (Loss)	**-**	**(136,890)**
Cash flow reconciliation:		
Add: Depreciation expense		950,842
Add: Paid from escrow or reserve		345,000
Add/Less: Accrued Interest payable to GRHC		59,851
Add: Capital Fund operations		441,081
Add: Principal pmts mortgage rec		-
Add: Anticipated Adjustments		350,000
Add: Cash Surplus from Prior Years		
Less: Mortgage principal payments		(317,523)
Less: Replacement reserve deposits		(78,102)
Less: Voluntary reserve deposits		(151,996)
Less: Capital items from operations		-
Less: IT Capital items from operations		-
Add/Less: MTW Transfer		137,600
Net estimated cash flow	**-**	**1,599,863**

ATTACHMENT L

EXCERPT, LIPH ADMISSIONS & CONTINUED OCCUPANCY POLICY
CHAPTER 9
REEXAMINATIONS

Chapter 9
REEXAMINATIONS
[24 CFR 960.257, 960.259, 966.4]

INTRODUCTION

The GRHC is required to reexamine each family's income and composition periodically, and to adjust the family's rent accordingly. The GRHC must adopt policies for conducting annual and interim reexaminations that are consistent with regulatory requirements and must conduct reexaminations in accordance with such policies [24 CFR 960.257(c)]. The frequency with which the GRHC must reexamine the income and composition of a family depends on whether the family pays income-based rent or flat rent. HUD requires the GRHC to offer all families the choice of paying income-based rent or flat rent at least annually. The GRHC's policies for offering families a choice of rent are located in Chapter 6.

This chapter discusses both annual and interim reexaminations.

Part I: Annual Reexaminations for Families Paying Income Based Rents. This part discusses the requirements for annual reexamination of income and family composition. Full reexaminations are conducted at least once a year for families paying income-based rents.

Part II: Reexaminations for Families Paying Flat Rents. This part contains the GRHC's policies for conducting full reexaminations of family income and composition for families paying flat rents. These full reexaminations are conducted at least once every 3 years. This part also contains the GRHC's policies for conducting annual updates of family composition for flat rent families.

Part III: Interim Reexaminations. This part includes HUD requirements and the GRHC policies related to when a family may and must report changes that occur between annual reexaminations.

Part IV: Recalculating Tenant Rent. After gathering and verifying required information for an annual or interim reexamination, the GRHC must recalculate the tenant rent. While the basic policies that govern these calculations are provided in Chapter 6, this part describes the policies that affect these calculations during a reexamination.

Policies governing reasonable accommodation, family privacy, required family cooperation and program abuse, as described elsewhere in this ACOP, apply to annual and interim reexaminations.

PART I: ANNUAL REEXAMINATIONS FOR FAMILIES PAYING INCOME-BASED RENTS [24 CFR 960.257]

9-I.A. OVERVIEW

This part discusses the requirements for annual reexamination of income and family composition. Full reexaminations are conducted at least once a year for families paying income-based rents.

GRHC MTW Flexibility

For the public housing program, the GRHC will decrease the frequency of reexaminations from annual to biennial for all LIPH families.

9-I.C. SCHEDULING ANNUAL REEXAMINATIONS

Generally, the GRHC will schedule annual/biennial reexaminations to coincide with the family's anniversary date. The GRHC will begin the annual reexamination process approximately 120 days in advance of the scheduled effective date. *Anniversary date* is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission). If the family transfers to a new unit, the GRHC will perform a new annual reexamination, and the anniversary date will be changed. The GRHC may also schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual/Biennial Reexamination Process

Families generally are required to participate in an annual/biennial reexamination interview, which must be attended by the head of household, spouse, or cohead. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the GRHC to request a reasonable accommodation. Notification of annual reexamination interviews will be sent by first-class mail or placed on door and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview. If the family is unable to attend a scheduled interview, the family should contact the GRHC in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend the scheduled interview, the GRHC will send a second notification with a new interview appointment time. If a family fails to attend two scheduled interviews without GRHC approval, the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13. An advocate, interpreter, or other assistant may assist the family in the interview process.

9-I.D. CONDUCTING ANNUAL REEXAMINATIONS

Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a GRHC-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 15 calendar days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an

extension. If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.

9-I.D. CALCULATING ANNUAL INCOME AT ANNUAL REEXAMINATION [24 CFR 5.609(c)(2) and Notice PIH 2023-27]

The GRHC must determine the income of the family for the previous 12-month period and use this amount as the family income for annual reexaminations. In determining the income of the family for the previous 12-month period, any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination in accordance with GRHC policies and 24 CFR 5.657(c) or 960.257(b) must be considered. Income from assets is always anticipated, irrespective of the income examination type.

A change in income may be a loss of income or the addition of a new source of income. Changing to a different employer in the prior year does not necessarily constitute a change if the income earned from either employer is substantially the same. The GRHC will look at the entirety of the family's unearned income and earned income from the prior year in which earned income may have been one constant job or many different jobs that start and stop.

Cost of Living Adjustments (COLA) to Social Security income and Social Security disability income are always considered changes to income because the COLA is an adjustment that automatically occurs annually by law. See Chapter 6 for GRHC policies on when the COLA is applied.

Notice PIH 2023-27 lists the following steps to calculate both earned and unearned income at annual reexamination.

Step 1: The GRHC determines annual income for the previous 12-month period by reviewing the following information:

- The EIV Income Report pulled within 120 days of the effective date of the annual reexamination;
- The income reported on the most recent HUD-50058; and
- The amount of prior-year income reported by the family on the PHA's annual reexamination paperwork.

Step 2: The GRHC takes into consideration any interim reexamination of family income completed since the last annual reexamination.

- If there was an interim reexamination performed, the GRHC will use the annual income from the interim to determine the family's total annual income, provided there are no additional changes.
- If the GRHC did not perform an interim or there have been changes since the last reexamination, the GRHC moves to Step 3.

Step 3: If there were changes in annual income not processed by the GRHC since the last reexamination, the GRHC must use current income. The family will be required to report their income for the prior year and whether there have been permanent changes. If there are no reported changes to an income source, the GRHC may use documentation of prior-year income to calculate the annual income. For example, the GRHC may use the following documentation:

- EIV + self-certification (wages, Supplemental Security Income (SSI), Social Security, and unemployment)
- Current written third-party verification from the source verifying prior-year income that is dated within 120 days of receipt by the PHA, for example:
  - Year-end statements
  - Paycheck with year-to-date amounts
  - Tax forms (Form 1040, W2, 1099, etc.)

If there are reported changes by the family or the GRHC notes discrepancies between EIV and what the family reports, the GRHC will follow the verification hierarchy (described in Chapter 7) to document and verify income. Exhibit 9-1 provides detailed examples of how the GRHC calculates income from different sources at annual reexamination using the above method.

9-I.E. OTHER CONSIDERATIONS

Change in Unit Size

Changes in family or household composition may make it appropriate to consider transferring the family to comply with occupancy standards. The PHA may use the results of the annual reexamination to require the family to move to an appropriate size unit [24 CFR 960.257(a)(4)]. Policies related to such transfers are located in Chapter 12.

Criminal Background Checks

Each household member age 18 and over will be required to execute a consent form for a criminal background check as part of the annual reexamination process.
Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].

At the annual reexamination, the GRHC will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The GRHC will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

If the GRHC proposes to terminate assistance based on lifetime sex offender registration information, the GRHC will notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 13.)

Compliance with Community Service

For families who include nonexempt individuals, the GRHC must determine compliance with community service requirements once each 12 months [24 CFR 960.257(a)(3)].
See Chapter 11 for the GRHC's policies governing compliance with the community service requirement.

9-I.E. EFFECTIVE DATES

As part of the annual reexamination process, the GRHC must make appropriate adjustments in the rent after consultation with the family and upon verification of the information [24 CFR 960.257(a)]. In general, an *increase* in the tenant rent that results from an annual reexamination

will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance. If less than 30 calendar days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30 calendar day notice period. If the GRHC chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the GRHC, but will always allow for the 30 calendar day notice period.

If the family causes a delay in processing the annual reexamination, *increases* in the tenant rent will be applied retroactively to the scheduled effective date of the annual reexamination. The family will be responsible for any underpaid rent and may be offered a repayment agreement in accordance with the policies in Chapter 16. In general, a *decrease* in the tenant rent that results from an annual reexamination will take effect on the family's anniversary date. If the GRHC chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the GRHC. If the family causes a delay in processing the annual reexamination, *decreases* in the tenant rent will be applied prospectively, from the first day of the month following completion of the reexamination processing. Delays in reexamination processing are caused by the family if the family fails to provide information requested by the GRHC by the date specified, and this delay prevents the GRHC from completing the reexamination as scheduled.

ATTACHMENT M

EXCERPT, LIPH ADMISSIONS & CONTINUED OCCUPANCY POLICY
CHAPTER 9, REEXAMINATIONS

PART III: INTERIM REEXAMINATIONS [24 CFR 960.257; 24 CFR 966.4]

9-III.A. OVERVIEW
This part explains that HUD requires the family to report changes in family circumstances and requires the GRHC to conduct interim reexaminations in certain situations.

9-III.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION
All families, those paying income-based rent as well as flat rent, must report all changes in family and household composition that occur between annual reexaminations (or annual updates).
The GRHC will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.

New Family Members Not Requiring Approval
The family must inform the GRHC of the birth, adoption, or court-awarded custody of a child within 15 calendar days.

New Family and Household Members Requiring Approval
Families must request GRHC approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 consecutive days or a total of 30 cumulative calendar days during any twelve (12) month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the GRHC prior to the individual moving into the unit.

If adding a person to a household (other than a child by birth, adoption, or court-awarded custody) will require a transfer to a larger size unit (under the transfer policy in Chapter 12), the GRHC will approve the addition only if the family can demonstrate that there are medical needs or other extenuating circumstances, including reasonable accommodation, that should be considered by the GRHC. Exceptions will be made on a case-by-case basis. The GRHC will not approve the addition of a new family or household member unless the individual meets the GRHC's eligibility criteria (see Chapter 3) and documentation requirements (See Chapter 7, Part II). If the GRHC determines that an individual does not meet the GRHC's eligibility criteria or documentation requirements, the GRHC will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial. The GRHC will make its determination within 15 calendar days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member
If a family member ceases to reside in the unit, the family must inform the GRHC within 15 calendar days. This requirement also applies to family members who had been considered temporarily absent, who are now permanently absent. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the GRHC within 15 calendar days.

9-III.C. CHANGES AFFECTING INCOME OR EXPENSES

This section only applies to families paying income-based rent. Families paying flat rent are not required to report changes in income or expenses.

Interim reexaminations for changes in income or expenses may be scheduled either because the GRHC has reason to believe that changes in income or expenses may have occurred, or because the family reports a change.

The GRHC will estimate the income of the family for the upcoming 12-month period to determine family income for an interim reexamination [24 CFR 5.609(c)(1)]. Policies for projecting income are found in Chapter 6.

Interim Decreases [24 CFR 960.257(b)(2) and Notice PIH 2023-27]

A family may request an interim determination of family income for any change since the last determination. However, the GRHC may decline to conduct an interim reexamination if the GRHC estimates the family's adjusted income will decrease by an amount that is less than 10 percent of the family's adjusted income. The GRHC may set a lower threshold in GRHC policy such as performing an interim for any decreases in adjusted income, although HUD prohibits the GRHC from setting a dollar-figure threshold.

However, while the GRHC has some discretion, HUD requires that the GRHC perform an interim reexamination for a decrease in adjusted income of any amount in two circumstances:

- When there is a decrease in family size attributed to the death of a family member; or
- When a family member permanently moves out of the assisted unit during the period since the family's last reexamination.

In the above circumstances, the GRHC will perform an interim reexamination for any decrease in adjusted income.

If the net effect of the changes in adjusted income due to a decrease in family size results in no change or an increase in annual adjusted income, then GRHC will process the removal of the household member(s) as a non-interim reexamination transaction without making changes to the family's annual adjusted income.

The GRHC will conduct an interim reexamination any time the family's adjusted income has decreased by any amount.

Interim Increases [24 CFR 960.257(b)(3) and Notice PIH 2023-27]

Increases Less than 10 Percent

The GRHC will not process interim reexaminations for income increases that result in less than a 10 percent increase in annual adjusted income.

Increases 10 Percent or Greater

The GRHC will conduct an interim reexamination of family income when the GRHC becomes aware that the family's adjusted income has changed by an amount that the GRHC estimates will result in an increase of 10 percent or more in adjusted income, only when the family has previously received an interim reduction during the same reexamination cycle; and

The GRHC will not conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date.

When the family previously received an interim reexamination for a decrease to adjusted income during the same annual reexamination cycle, a PHA has the discretion whether to consider a subsequent increase in earned income.

When the family previously received an interim reexamination for a decrease to adjusted income during the same annual reexamination cycle, a PHA has the discretion whether to consider a subsequent increase in earned income.

Concurrent Increases in Earned and Unearned Income [Notice PIH 2023-27]

When the family reports an increase in both earned and unearned income at the same time, the GRHC will look at the earned and unearned income changes independently of each other to determine if an interim reexamination is performed. The GRHC will only conduct an interim reexamination when the increase independently meets the 10 percent threshold and all other requirements for performing interim reexaminations. For example, if a family reported increases in both earned and unearned income that overall resulted in a 12 percent increase in their adjusted income, but the change in earned income represented a 7 percent increase and the change in unearned income represented a 5 percent increase, the GRHC will not perform an interim for either change since neither change meets the 10 percent threshold amount independently. If the change in unearned income met the 10 percent threshold in this case, the GRHC will perform an interim. If the change in earned income met the 10 percent threshold in this case, the GRHC would refer to GRHC policy to determine whether an interim was required.

Cumulative Increases [Notice PIH 2023-27]

A series of smaller reported increases in adjusted income may cumulatively meet or exceed the 10-percent increase threshold, at which point the GRHC will conduct an interim reexamination in accordance with GRHC policy.

Public Housing Over-Income Families [24 CFR 960.507(c); Notice PIH 2020-3; and Notice PIH 2023-27]

Regardless of changes in adjusted income, in some circumstances the GRHC is required to conduct an interim reexamination to determine whether a family's income continues to exceed the public housing over-income limit. The GRHC will conduct income examinations of public housing families who have been determined to exceed the over-income limit at specific intervals. When the GRHC makes an initial determination that a family is over-income during an interim reexamination, the GRHC will conduct a second interim reexamination 12 months after the over-income determination, and then again 12 months after the second over-income determination, unless the family's income falls below the over-income limit during the 24-month period. This continued evaluation of the family's over-income status requires the GRHC to notify any family that exceeds the over-income limit that they remain over the income limit, even if the family is paying the flat rent [24 CFR 960.253]. An interim income reexamination to determine if a public housing family remains over-income does not reset the family's normal annual reexamination date.

Family Reporting

The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report changes in income within 10 business days of the date the change takes effect. The family may notify the GRHC of changes either orally or in writing. If the family provides oral notice, the GRHC will also require the family to submit the changes in writing.

Within 15 calendar days of the family reporting the change, the GRHC will determine whether the change will require an interim reexamination.

- If the change will not result in an interim reexamination, the GRHC will note the information in the tenant file but will not conduct an interim reexamination. The GRHC will send the family written notification within 15 calendar days of making this determination informing the family that the PHA will not conduct an interim reexamination.
- If the change will result in an interim reexamination, the GRHC will determine the documentation the family will be required to submit based on the type of change reported and GRHC policies in Chapter 7. The GRHC will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 10 business days of receiving a request from the GRHC. This time frame may be extended for good cause with GRHC approval. The GRHC will accept required documentation by mail, email, fax, or in person. The GRHC will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information.

Generally, the family will not be required to attend an interview for an interim reexamination. However, if the GRHC determines that an interview is warranted, the family may be required to attend.

9-III.D. EFFECTIVE DATES

Changes Reported Timely [24 CFR 960.257(b)(6) and Notice PIH 2023-27]

If the family reports a change in family income or composition timely in accordance with GRHC policies:

- For rent increases, the GRHC must provide the family with 30 days advance written notice. The rent increase is effective the first of the month after the end of that 30-day notice period.
- Rent decreases are effective on the first of the month after the date of the actual change leading to the interim reexamination of family income. This means the decrease will be applied retroactively.

Changes Not Reported Timely [24 CFR 960.257(b)(6)(ii) and (iii) and Notice PIH 2023-27]

If the family failed to report a change in family income or composition timely in accordance with GRHC policies:

- For rent increases, the GRHC will implement any resulting rent increases retroactively to the first of the month following the date of the change leading to the interim reexamination of family income.
- For rent decreases, the GRHC will implement the change no later than the first rent period following completion of the interim reexamination.

ATTACHMENT N

EXCERPT, HCV ADMINISTRATIVE PLAN CHAPTER 11 REEXAMINATIONS

PART I: ANNUAL REEXAMINATIONS [24 CFR 982.516]

11-I.A. OVERVIEW

The GRHC will conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.

Unlike when performing an interim reexamination or at intake, at annual reexamination, the GRHC will determine the income of the family for the previous 12-month period. Income from assets, however, is always anticipated, irrespective of the income examination type [Notice PIH 2023-27]. Chapter 7 contains the GRHC's policies related to streamlined income determinations and the use of safe harbor income verifications.

11-I.B. SCHEDULING ANNUAL REEXAMINATIONS

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

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission). If the family moves to a new unit, the GRHC will perform a new annual reexamination. The GRHC also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

GRHC MTW Flexibility

For HCV Programs, the GRHC will decrease the frequency of reexaminations from annual to biennial for all families in the HCV Program.

Notification of and Participation in the Annual Reexamination Process

Families are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse, or cohead. Generally, the interview will be performed by phone or a virtual meeting but may be conducted in-person if preferred or with reasonable accommodation. (see Chapter 2).

Notification of annual reexamination interviews will be sent by email or USPS mail and will contain the date, time, and location (if applicable) of the interview. In addition, it will inform the family of the information and documentation that must be sent to the GRHC.

If the family cannot attend a scheduled interview, they should contact the GRHC before the interview to schedule a new interview. If a family does not attend the scheduled interview, the GRHC will send a second notification with a new interview date and appointment time.

If a family fails to attend two scheduled interviews without GRHC approval, or if the notice is returned by the post office with no forwarding address, and no response to phone calls, a notice

of termination (see Chapter 12) will be sent to the family's address of record, and to any alternate address provided in the family's file.

An advocate, interpreter, or other assistant may assist the family in the interview process.

11-I.C. CONDUCTING ANNUAL REEXAMINATIONS

As part of the annual reexamination process, families are required to provide updated information to the GRHC regarding the family's income, expenses, and composition [24 CFR 982.551(b)].

Families will be asked to provide all required information (as described in the reexamination notice) for the reexamination interview. The required information will include a GRHC-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documents or forms related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 15 calendar days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (See Chapter 12).

At the annual reexamination, the GRHC will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime or any other sex offender registration requirement in any state. The GRHC will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

If the GRHC proposes to terminate assistance based on lifetime sex offender registration information, the GRHC will notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 12.)

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the GRHC has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social Security numbers
- A person's disability status
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according to the housing quality standards (HQS) (see Chapter 8), the GRHC will issue the family a new voucher, and the family

will try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the GRHC will terminate the HAP contract in accordance with its terms [24 CFR 982.403].

11-I.D. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS [24 CFR 982.552(b)(5)]

Section 327 of Public Law 109-115 established new restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be reexamined along with the income eligibility of the student's parents on an annual basis. In these cases, both the student and the student's parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from his or her parents or is considered a *vulnerable youth* in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's ongoing eligibility.

Students who reside with parents in an HCV assisted unit are not subject to this provision. It is limited to students who are receiving assistance on their own, separately from their parents.

During the annual reexamination process, the GRHC will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from his/her parents or is considered a *vulnerable youth* based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.

If the student is no longer income eligible based on his/her own income or the income of his/her parents, the student's assistance will be terminated in accordance with the policies in Section 12-I.D.

If the student continues to be income eligible based on his/her own income and the income of his/her parents (if applicable), the GRHC will process a reexamination in accordance with the policies in this chapter.

- If the GRHC chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the GRHC.
- If the family causes a delay in processing the annual reexamination, *decreases* in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the GRHC by the date specified, and this delay prevents the GRHC from completing the reexamination as scheduled.

GRHC MTW Flexibility

The effective date for HCV families will occur two (2) years after the initial certification (new admission).

11-I.E. CALCULATING ANNUAL INCOME AT ANNUAL REEXAMINATION [24 CFR 5.609(c)(2) and Notice PIH 2023-27]

The GRHC will determine the income of the family for the previous 12-month period and use this amount as the family income for annual reexaminations.

When determining the income of the family for the previous 12-month period, any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination in accordance with GRHC policies and 24 CFR 5.657(c) or 960.257(b) must be considered.

Income from assets is always anticipated, irrespective of the income examination type.

A change in income may be a loss of income or the addition of a new source of income. Changing to a different employer in the prior year does not necessarily constitute a change if the income earned from either employer is substantially the same. The GRHC will look at the entirety of the family's unearned income and earned income from the prior year in which earned income may have been one constant job or many different jobs that start and stop.

Cost of Living Adjustments (COLA) to Social Security income and Social Security disability income are always considered changes to income because the COLA is an adjustment that automatically occurs annually by law. See Chapter 6 for GRHC policies on when the COLA is applied and Chapter 7 on streamlined determination of income for inflationary adjustments.

Notice PIH 2023-27 lists the following steps to calculate both earned and unearned income at annual reexamination.

Step 1: The GRHC determines annual income for the previous 12-month period by reviewing the following information:

- The EIV Income Report pulled within 120 days of the effective date of the annual reexamination;
- The income reported on the most recent HUD–50058; and
- The amount of prior-year income reported by the family on the GRHC's annual reexamination paperwork.

Step 2: The GRHC takes into consideration any interim reexamination of family income completed since the last annual reexamination.

- If there was an interim reexamination performed, the GRHC will use the annual income from the interim to determine the family's total annual income, provided there are no additional changes.
- If the GRHC did not perform an interim or there have been changes since the last reexamination, the GRHC moves to Step 3.

Step 3: If there were changes in annual income not processed by the GRHC since the last reexamination, the GRHC will use current income. The family will be required to report their income for the prior year and whether there have been permanent changes.

If there are no reported changes to an income source, the GRHC may use documentation of prior-year income to calculate the annual income. For example, the GRHC may use the following documentation:

- EIV + self-certification (wages, Supplemental Security Income (SSI), Social Security, and unemployment)

- Current written third-party verification from the source verifying prior-year income that is dated within 120 days of receipt by the GRHC, for example:
  - Year-end statements
  - Paycheck with year-to-date amounts
  - Tax forms (Form 1040, W2, 1099, etc.)

If there are reported changes by the family or the GRHC notes discrepancies between EIV and what the family reports, the GRHC will follow the verification hierarchy (described in Chapter 7) to document and verify income. Exhibit 11-1 provides detailed examples of how the GRHC calculates income from different sources at annual reexamination using the above method.

11-I.F. EFFECTIVE DATES

The GRHC has establish policies concerning the effective date of changes that result from an annual reexamination [24 CFR 982.516].

In general, an *increase* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 calendar days in advance.

- If less than 30 calendar days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.
- If a family moves to a new unit, the increase will take effect on the effective date of the new lease and HAP contract, and no 30-day notice is required.
- If the GRHC chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the GRHC, but will always allow for the 30-day notice period.
- If the family causes a delay in processing the annual reexamination, increases in the family share of the rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a *decrease* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

- If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

ATTACHMENT O

Grand Rapids Housing Commission
Fair Market Rent and Voucher Payment Standard Schedule
Kent County
Effective January 01, 2025

All unit types	0BR	1BR	2BR	3BR	4BR	5BR	6BR
2024 FMRs	1,163	1,209	1,443	1,880	2,057	2,366	2,674

Voucher Payment Standard (VPS)	0BR	1BR	2BR	3BR	4BR	5BR	6BR
NEW VPS	1,279	1,330	1,587	2,068	2,263	2,602	2,942

FMRs: 01/01/2025
VPS (110% of FMRs): 01/01/2025

Allowances for Tenant-Furnished Utilities and Other Services

Effective 2/1/2025

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Locality		Green Discount	Unit Type		Weather Code	Date
Kent County - 2025		None	Row House & Apartment		MI073	2025-01-01
Utility/Service		Monthly Dollar Allowances				
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Space Heating	Natural Gas	$27	$32	$37	$42	$48	$53
	Bottle Gas						
	Electric Resistance	$47	$55	$72	$89	$106	$123
	Electric Heat Pump	$35	$41	$49	$55	$61	$67
	Fuel Oil						
Cooking	Natural Gas	$2	$3	$4	$5	$6	$8
	Bottle Gas						
	Electric	$7	$9	$12	$16	$20	$26
	Other						
Other Electric		$35	$41	$57	$73	$89	$105
Air Conditioning		$5	$6	$13	$18	$23	$28
Water Heating	Natural Gas	$7	$8	$12	$16	$20	$23
	Bottle Gas						
	Electric	$24	$28	$36	$47	$57	$65
	Fuel Oil						
Water		$24	$25	$33	$45	$57	$70
Sewer		$37	$39	$53	$75	$96	$118
Electric Fee		$9	$9	$9	$9	$9	$9
Natural Gas Fee		$14	$14	$14	$14	$14	$14
Fuel Oil Fee							
Bottled Gas Fee							
Trash Collection		$33	$33	$33	$33	$33	$33
Range/Microwave		$21	$21	$21	$21	$21	$21
Refrigerator		$25	$25	$25	$25	$25	$25
Other – specify							

Allowances for Tenant-Furnished Utilities and Other Services

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Locality		Green Discount	Unit Type		Weather Code	Date
Kent County - 2025		None	Single Family House		MI073	2025-01-01
Utility/Service		Monthly Dollar Allowances				
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Space Heating	Natural Gas	$31	$36	$42	$49	$55	$61
	Bottle Gas						
	Electric Resistance	$76	$90	$106	$121	$137	$152
	Electric Heat Pump	$41	$48	$57	$64	$71	$79
	Fuel Oil						
Cooking	Natural Gas	$2	$3	$4	$5	$6	$8
	Bottle Gas						
	Electric	$7	$9	$12	$16	$22	$26
	Other						
Other Electric		$41	$48	$66	$85	$104	$124
Air Conditioning		$4	$5	$13	$20	$27	$35
Water Heating	Natural Gas	$7	$8	$12	$16	$20	$23
	Bottle Gas						
	Electric	$24	$28	$37	$48	$57	$65
	Fuel Oil						
Water		$24	$25	$33	$45	$57	$70
Sewer		$37	$39	$53	$75	$96	$118
Electric Fee		$9	$9	$9	$9	$9	$9
Natural Gas Fee		$14	$14	$14	$14	$14	$14
Fuel Oil Fee							
Bottled Gas Fee							
Trash Collection		$33	$33	$33	$33	$33	$33
Range/Microwave		$21	$21	$21	$21	$21	$21
Refrigerator		$25	$25	$25	$25	$25	$25
Other – specify							

Grand Rapids Housing Commission
Fair Market Rent and Voucher Payment Standard Schedule
Ottawa County
Effective January 01, 2025

All unit types	0BR	1BR	2BR	3BR	4BR	5BR	6BR
2025 FMRs	953	1,197	1,363	1,750	1,990	2,289	2,587

Voucher Payment Standard (VPS)	0BR	1BR	2BR	3BR	4BR	5BR	6BR
NEW VPS	1,048	1,317	1,499	1,925	2,090	2,403	2,716

FMRs: 01/01/2025
VPS (105% and 110% of FMRs): 01/01/2025

Allowances for Tenant-Furnished Utilities and Other Services

Effective 2/1/2025

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Locality	Green Discount	Unit Type	Weather Code	Date
Ottawa County - 2025	None	Row House & Apartment	MI073	2025-01-01

Utility/Service		Monthly Dollar Allowances					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Space Heating	Natural Gas	$25	$30	$35	$39	$44	$49
	Bottle Gas	$79	$93	$108	$123	$138	$152
	Electric Resistance	$35	$42	$55	$67	$80	$93
	Electric Heat Pump	$26	$31	$37	$41	$46	$51
	Fuel Oil	$95	$112	$130	$148	$165	$183
Cooking	Natural Gas	$2	$3	$4	$5	$6	$7
	Bottle Gas	$7	$8	$11	$15	$18	$22
	Electric	$6	$7	$9	$12	$15	$19
	Other						
Other Electric		$27	$31	$43	$56	$68	$80
Air Conditioning		$4	$4	$8	$12	$15	$18
Water Heating	Natural Gas	$7	$8	$11	$15	$18	$22
	Bottle Gas	$21	$24	$35	$46	$57	$68
	Electric	$18	$22	$28	$34	$40	$47
	Fuel Oil	$25	$29	$42	$55	$68	$81
Water		$22	$23	$29	$39	$48	$57
Sewer		$27	$28	$38	$52	$67	$82
Electric Fee		$18	$18	$18	$18	$18	$18
Natural Gas Fee		$14	$14	$14	$14	$14	$14
Fuel Oil Fee							
Bottled Gas Fee							
Trash Collection		$25	$25	$25	$25	$25	$25
Range/Microwave		$21	$21	$21	$21	$21	$21
Refrigerator		$25	$25	$25	$25	$25	$25
Other – specify							

Allowances for Tenant-Furnished Utilities and Other Services

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Locality	Green Discount	Unit Type	Weather Code	Date
Ottawa County - 2025	None	Single Family House	MI073	2025-01-01

Utility/Service		Monthly Dollar Allowances					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Space Heating	Natural Gas	$29	$34	$39	$45	$51	$56
	Bottle Gas	$89	$105	$123	$141	$158	$176
	Electric Resistance	$58	$68	$80	$92	$103	$115
	Electric Heat Pump	$31	$36	$43	$49	$54	$59
	Fuel Oil	$107	$126	$148	$169	$190	$212
Cooking	Natural Gas	$2	$3	$4	$5	$6	$7
	Bottle Gas	$7	$8	$11	$15	$18	$22
	Electric	$6	$7	$9	$12	$16	$19
	Other						
Other Electric		$31	$36	$50	$65	$79	$93
Air Conditioning		$3	$4	$8	$13	$18	$22
Water Heating	Natural Gas	$7	$8	$11	$15	$18	$22
	Bottle Gas	$21	$24	$35	$46	$57	$68
	Electric	$18	$22	$28	$34	$40	$47
	Fuel Oil	$25	$29	$42	$55	$68	$81
Water		$22	$23	$29	$39	$48	$57
Sewer		$27	$28	$38	$52	$67	$82
Electric Fee		$18	$18	$18	$18	$18	$18
Natural Gas Fee		$14	$14	$14	$14	$14	$14
Fuel Oil Fee							
Bottled Gas Fee							
Trash Collection		$25	$25	$25	$25	$25	$25
Range/Microwave		$21	$21	$21	$21	$21	$21
Refrigerator		$25	$25	$25	$25	$25	$25
Other – specify							

Grand Rapids Housing Commission
Flat Rent Schedule
Effective January 01, 2025

All unit types	**1BR**	**2BR**	**3BR**	**4BR**
2024 FMRs	1,209	1,443	1,880	2,057

Flat Rent	**1BR**	**2BR**	**3BR**	**4BR**
NEW FLAT RENT	967	1,154	1,504	1,646

FMRs: 01/01/2025
Flat Rent (80% of FMRs): 01/01/2025

ATTACHMENT P

Grand Rapids Housing Commission

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

For the year ended June 30, 2024

C. FINDINGS - FEDERAL AWARDS PROGRAMS AND QUESTIONED COSTS

2024-001 Eligibility

Moving to Work Demonstration Program AL No. 14.881
Significant deficiency in internal control
Other Matter to be Reported Under the Uniform Guidance

Condition: Out of an approximate population of 4,700 of Section 8 Housing Choice Voucher and 220 Low Rent Public Housing tenants the following deficiencies were noted:

Section 8 Housing Choice Voucher (a total of 40 tenants selected for testing):

- Four files did not have annual recertifications performed during the year available,
- Four files did not use the correct utility allowance,
- Two files did not have support necessary to verify income adjustments,
- One file did not use the correct payment standard,
- One file did not have support necessary to verify income exemptions,
- Six files did not have documentation necessary to verify the reported income,
- Seven files did not have a 214 declaration for a member of the household, and
- Two files did not have documentation necessary to verify custody of dependent

Low Rent Public Housing (a total of 20 tenants selected for testing):

- One file did not contain a flat rent options form,
- Two files did not have documentation necessary to verify the reported income,
- One file did not have a 214 declaration for a member of the household,
- One file did not have support necessary to verify income adjustments,
- Two files did not have 9886 release of information from within 15 months of the annual recertification, and
- Two files did not have an internal control document

Criteria: The Commission's ACOP, Administrative Plan, 24 CFR 960.259, and 24 CFR 982.516 require internal controls to be in place to ensure proper procedures are being followed in compliance with HUD requirements regarding timely, complete, and accurate tenant files.

Context: The auditor randomly selected tenant files out of the population from each program as outlined, which we consider to be a statistically valid sample size. The auditor reviewed the tenant files and support to ensure that proper procedures are being followed and that the Commission is in compliance with HUD requirements regarding timely, complete, and accurate tenant files.

Cause: The Commission does not have adequate systems and controls in place to ensure all eligibility requirements are being followed.

C. FINDINGS - FEDERAL AWARDS PROGRAMS AND QUESTIONED COSTS (continued)

2024-001 Eligibility (continued)

Moving to Work Demonstration Program AL No. 14.881
Significant deficiency in internal control
Other Matter to be Reported Under the Uniform Guidance

Effect: The Commission is not in compliance with all of the HUD requirements regarding eligibility and tenant recertification which could result in incorrect amount of rental assistance being provided.

Questioned Costs: Unknown.

Auditor Recommendations: The Commission should reevaluate their established procedures and controls in place to ensure full compliance in regards to eligibility and the timeliness of recertifications. The Commission needs to correct the deficiencies noted in the tested files and consider the impact to the rest of the population of tenant files that were not selected as part of the auditor's sample.

Management Response: See Corrective Action Plan.

D. SUMMARY OF PRIOR YEAR FINDINGS

None.

GRAND RAPIDS HOUSING COMMISSION

Corrective Action Plan

March 28, 2025

U.S. Department of Housing and Urban Development

The Grand Rapids Housing Commission respectfully submits the following corrective action plan for the year ended June 30, 2024.

Berman Hopkins Wright & LaHam, CPAs and Associates, LLP
8035 Spyglass Hill Road
Melbourne, FL 32940

Audit period: July 1, 2023 – June 30, 2024

FINDINGS - FEDERAL AWARD PROGRAMS AUDIT

2024-001 Eligibility
Moving to Work Demonstration Program AL No. 14.881
Significant deficiency in internal control
Other Matter to be Reported Under the Uniform Guidance

Condition: Out of an approximate population of 4,700 of Section 8 Housing Choice Voucher and 220 Low Rent Public Housing tenants the following deficiencies were noted:

Section 8 Housing Choice Voucher (a total of 40 tenants selected for testing):

- Four files did not have annual recertifications performed during the year available,
- Four files did not use the correct utility allowance,
- Two files did not have support necessary to verify income adjustments,
- One file did not use the correct payment standard,
- One file did not have support necessary to verify income exemptions,
- Six files did not have documentation necessary to verify the reported income,
- Seven files did not have a 214 declaration for a member of the household
- Two files did not have documentation necessary to verify custody of dependent

Low Rent Public Housing (a total of 20 tenants selected for testing):

- One file did not contain a flat rent options form,
- Two files did not have documentation necessary to verify the reported income,
- One file did not have a 214 declaration for a member of the household,
- One file did not have support necessary to verify income adjustments,
- Two files did not have 9886 release of information from within 15 months of the annual recertification
- Two files did not have an internal control document

Auditor Recommendations: The Commission should reevaluate their established procedures and controls in place to ensure full compliance in regards to eligibility and the timeliness of recertifications. The Commission needs to correct the deficiencies noted in the tested files and consider the impact to the rest of the population of tenant files that were not selected as part of the auditor's sample.

Action Taken:

GRHC Response & Corrective Action Plan

The GRHC does not dispute the finding and acknowledges the deficiencies identified. Due to staff shortages and turnover, GRHC experienced challenges in maintaining consistent file management, eligibility determinations, and recertifications in strict compliance with HUD requirements.

However, prior to the auditor's testing that resulted in this finding, the GRHC had already begun discussing strategies to address these issues. Recognizing the need for stronger internal controls and process improvements, the GRHC initiated a plan to enhance file management, compliance monitoring, and process reviews. This plan includes:

- **Process Mapping of Critical Functions** to standardize workflows, ensure consistency, and eliminate inefficiencies.
- **Digitization of forms** to improve efficiency and reduce errors.
- **Electronic document signing** to streamline tenant file processing.
- **Internal control checklists** to ensure completeness and accuracy before file submission.
- **Quality control (QC) review of all files by a manager** before final submission to ensure compliance with HUD regulations.

Strategies for these improvements began in August 2024 and are scheduled for full implementation by July 2025. GRHC leadership has been actively monitoring these efforts and meeting regularly to ensure progress toward compliance.

Corrective Actions & Implementation Plan

Corrective Action	Responsible Group	Completion Date	Status
Process mapping of critical workflows to ensure standardized procedures for eligibility and recertifications.	Policy and Program	Feb 2025	Completed
Implement digitization of forms to streamline eligibility and recertification processes.	Policy and Program	30-Apr-25	In Progress
Introduce electronic document signing to enhance efficiency and reduce processing time.	Policy and Program /IT	30-Apr-25	In Progress
Develop and enforce internal control checklists for eligibility and recertifications.	Policy and Program/IT	31-May	In Progress
Provide staff training on new processes and HUD compliance requirements.	Policy and Program	30-Apr-25	Planned
Conduct internal audits to evaluate the effectiveness of the new controls before manager QC begins.	Policy and Program	30-Jun-25	Planned
Require manager-level QC review of all tenant files before submission.	Program Managers	01-Jul-25	Planned
Implement a formal backup plan to ensure timely eligibility processing during staff absences or workload surges.	ED/Program Directors	01-July-25	Planned
Regular reporting to GRHC leadership on the status of tenant file compliance improvements.	ED/Policy and Program	Ongoing	Planned

Expected Outcome

- Full compliance with HUD requirements for eligibility and recertifications.
- Improved internal controls to prevent future deficiencies.
- A sustainable QC system for ongoing compliance monitoring.

Monitoring & Follow-Up

- The Policy and Program Implementation Manager will oversee corrective actions and provide bi-weekly progress updates.
- The Executive Director will present the Corrective Action Plan at the next board meeting.

Contact Person: Jose L. Capeles
Title: Policy and Program Planning and Implementation Manager
Date: 03/28/2025

Sincerely yours,

Lindsey Reames
Executive Director

ATTACHMENT Q

GRAND RAPIDS HOUSING COMMISSION
RESIDENT ADVISORY BOARD MEETING
Thursday, March 20, 2025
2:00 P.M.
Adams Park
1440 Fuller Ave SE

1. Introductions
2. Annual Plan
3. Five-year Plan
4. Strategic Planning
5. Security
6. Update on Adams redevelopment
7. Updates from the sites

Adjournment

MINUTES OF MARCH 20, 2025

MEETING OF THE RESIDENT ADVISORY BOARD OF THE

GRAND RAPIDS HOUSING COMMISSION

The Resident Advisory Board meeting of the Grand Rapids Housing Commission was held on March 20, 2025 in the community room of Adams Park Apartments at 1440 Fuller Ave SE, Grand Rapids, Michigan for the purpose of reviewing the Grand Rapids Housing Commission Agency Plan (Agenda and sign in sheet attached).

The meeting was called to order at 2:08 P.M.

Roll Call: Present: Michael Bernier of Leonard Terrace, Jacqueline Moore of Adams Park, Marian Carman of Ransom Tower, and Lucille Nelson of Sheldon Apartments.

Grand Rapids Housing Commission staff attending: Executive Director Lindsey Reames, Policy & Program Planning & Implementation Manager Jose Capeles, Rehabilitation and Maintenance Manger Ufoma Johnson, Director of Resident Services Felicia Clay, Policy and Program Analysts Kristine Huston, Toni Coristine, and Joey Oosterman, Asset Manager Gabe Kinne, Resident Services Manager Joyce Williams, and Resident Services Coordinators Erin Shibley, Rachel Siebert, Gregory Mason, Eulondon Reeves, Latasha Maberry, and Eric Turkaleski.

1. The Policy & Program Planning & Implementation Manager welcomed and initiated introductions of the RAB members and staff attending the meeting.

2. The Policy & Program Planning & Implementation Manager introduced the Grand Rapids Housing Commission Five-year plan, including a presentation of the new mission, vision, and core values. (presentation slides attached)

3. The Policy & Program Planning & Implementation Manager introduced the Grand Rapids Housing Commission Annual Plan. There will no longer be a preference on the applications for those displaced by government action (presentation slides attached).

4. The Policy & Program Planning & Implementation Manager informed the Board that there is work being done on Strategic Planning. When the report is finished it will be distributed to the members of the Resident Advisory Board.

5. The Executive Director addressed the Board regarding security issues. The roving security patrols that were travelling among most of the sites are now targeted at Mount Mercy and Antoine Court to address their immediate security concerns. The security team is available to be called to the other sites if needed.

6. The Executive Director gave updates on the Adams Park redevelopment plans. The current projected date to start moving residents out and into other housing in Spring 2026. Demolition of the existing building is targeted for Summer 2027. The plans for new construction are still being developed, but the building at 1420 Fuller may also be demolished and room made in the new Adams Park building for office space for Grand Rapids Housing Commission administrative offices.

7. The Executive Director opened the discussion for Board members to express any other feedback.

    a. Marian Carman from Ransom Tower wanted to know what to do about racial profiling at Ransom. The Executive Director suggested that she start by talking to the Resident Services Coordinator, Maria Lara, to explain what she is seeing and find a resource to address this concern. Marian also reported that there is a severe draft coming from the slider door in her apartment. The Executive Director informed Marion that there

are major roof and HVAC work beginning this Spring and replacements of windows and sliders planned in the near future for Ransom Tower.

b. Lucille Nelson of Sheldon Apartments reported that she had purchased and installed a folding screen to protect her house from the bugs coming from the large tree near her door. She was upset that she was given a lease violation because it made her residence look less uniform. The Executive Director said that she would look into the situation.

There being no further comments, the meeting was adjourned at 3:42 P.M.

Lindsey S. Reames

GRAND RAPIDS HOUSING COMMISSION
RESIDENT ADVISORY BOARD MEETING
Thursday, March 20, 2025
2:00 p.m.
Adams Park

Sign in sheet

1. Michael Bernier — Leonard Terr
2. Jacqueline Moore — Adams Park
3. Marian Carman — Ransom
4. Lucille Nelson — Sheldon Apts.
5. Eric Imfeld — Adams Park
6. Kristine Huston — GRHC
7. Gabriel Kinne — Adams Park
8. Joyce Williams — Resident Services
9. Joey Oosterman — GRHC
10. Toni Cristine — GRHC
11. Erin Shibley — GRHC
12. Latasha Maberry — GRHC
13. Rachel Sigbert — GRHC
14. Felicia Clark — GRHC
15. Eulondra Reeves — GRHC
16. Ufoma Johnson — GRHC
17. Jose Lopez — GRHC

Grand Rapids Housing Commission
Resident Advisory Board
5 Year Plan and Annual Plan

GRAND RAPIDS HOUSING COMMISSION

Mission

We are committed to offering quality affordable housing, essential resources through advocacy and partnerships, and promoting self-sufficiency to strengthen communities.

GRAND RAPIDS HOUSING COMMISSION

Vision

To create communities where housing is affordable, opportunities are impactful, and self-sufficiency is the goal.

GRAND RAPIDS HOUSING COMMISSION

We create **HOMES** with:

Housing: We believe that everyone deserves a place to call home.

Open Communication: We share ideas in a collaborative setting by building trust through clear and consistent communication.

Mutual Respect: We honor and value each individual, fostering a culture where every voice is heard and respected.

Excellence: We strive for excellence in everything we do, promoting a culture of accountability and continuous growth.

Supportive Communities: We create communities that emphasize well-being and offer holistic support, motivating individuals and families to thrive.

GRAND RAPIDS HOUSING COMMISSION

5 Year Plan

Strengthening Partnerships, Collaboration, and Networks

- Addressing housing insecurity requires a coordinated effort among public agencies, private developers, nonprofit organizations, and community stakeholders.
- **Key Goals include:**
  - Expanding formal partnerships with workforce development agencies, healthcare providers, and community service organizations.
  - Strengthening engagement with landlords through incentives and improved communication strategies.
  - Collaborating with financial institutions to explore new funding models for affordable housing development.

Education – Empowering Stakeholders for Sustainable Housing Stability

- Education plays a critical role in ensuring the long-term stability of both program participants and landlords.
- **Key Goals include:**
  - Implementing a landlord education program.
  - Launching a financial literacy and self-sufficiency workshop series for residents.
  - Increasing staff training in housing regulations, case management, and data analytics.
  - Developing a public education campaign to reduce stigma around affordable housing.

Case Management – Implementing a Holistic Navigation Model

- A comprehensive case management and navigation model will be implemented to support individuals and families in maintaining stable housing.
- **Key Goals include:**
  - Developing a tiered service model based on individual risk factors and long-term stability goals.
  - Leveraging the housing barrier fund to assist residents with emergency financial needs.
  - Using data-driven assessments to predict housing instability and intervene proactively.

Advocacy – Shaping Policy for Systemic Change

- Advocacy at the federal, state, and local levels will be an essential component of GRHC's strategy to expand affordable housing opportunities.
- **Key Goals include:**
  - Engaging in legislative advocacy to secure increased federal and state funding for housing programs.
  - Strengthening partnerships with elected officials to advance housing-friendly policies.
  - Developing policy research and reports to inform public and private stakeholders.
  - Elevating resident voices through participatory governance and advocacy training

Creating More Housing Opportunities

- To address the increasing demand for affordable housing, GRHC will focus on creating more housing opportunities through development, acquisition, rehabilitation and preservation, and innovative funding strategies.
- **Key Goals include:**
  - Developing mixed-income housing projects that integrate affordable units into broader market-rate developments.
  - Pursuing adaptive reuse projects to convert underutilized properties into affordable housing.
  - Expanding GRHC's housing portfolio to include market-rate units that generate revenue for reinvestment.
  - Identifying and applying for new funding sources to support long-term housing expansion.

Stronger Data and Analytics – Leveraging Insights for Greater Impact

- Data analytics will be a critical tool in ensuring that our strategies are effective and responsive to the needs of the community.
- **Key Goals include:**
  - Implementing a real-time housing stability dashboard to monitor key indicators.
  - Conducting impact assessments to evaluate program success and inform future strategies.
  - Using predictive analytics to identify risk factors and provide preemptive support.
  - Publishing an annual housing impact report to increase transparency and public engagement.

GRAND RAPIDS HOUSING COMMISSION

Annual Plan


Thank You!

ATTACHMENT R

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Mark Washington (*Official's Name*), the City Manager (*Official's Title*)

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year 2026 of the Grand Rapids Housing Commission (*PHA Name*) is consistent with the

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Grand Rapids
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The Grand Rapids Housing Commission FY 2026 Annual Agency Plan and Moving to Work Supplement address affordable housing needs identified in the 2021-2025 Regional Consolidated Housing and Community Development (HCD) Plan (effective through 6/30/2026). The Plan covers the City of Grand Rapids and Kent County.

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

Name of Authorized Official:	Title:
Mark Washington	City Manager
Signature:	Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

ATTACHMENT S

Certifications of Compliance with PHA Plan and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 3/31/2024**

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the_X_ 5-Year and/or_X_ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 7/1/2025, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
   (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
   (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
   (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

___Grand Rapids Housing Commission — MI073
PHA Name — PHA Number/HA Code

X Annual PHA Plan for Fiscal Year 2025

X 5-Year PHA Plan for Fiscal Years 2025 - 2030

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

Name of Executive Director	Lindsey S. Reames		Name Board Chairman	Monica Steimle-App	
Signature		Date	Signature		Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 3/31/2024

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan , hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning __7/1/2025_____ in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq*.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

_Grand Rapids Housing Commission_____ _MI073_____
PHA Name PHA Number/HA Code

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

Name of Executive Director: Lindsey S. Reames		Name of Board Chairperson: Monica Steimle-App	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.