#### **RESOLUTION 2018-10-24 (3)**

Date:

October 15, 2018

To:

THA Board of Commissioners

From:

Michael Mirra

**Executive Director** 

Re:

Waiting List Management for the Portfolio

This resolution would approve revisions to Tacoma Housing Authority's Administrative Plan and Continued Occupancy Plan (ACOP) to improve THA's management of the waiting list for THA's managed portfolio and for the Housing Opportunity Program (HOP). These recommendations do not pertain to THA properties that THA does not manage directly.

#### Background

This resolution seeks approval to adopt nine (9) recommendations for changes to the Tacoma Housing Authority (THA) waiting list policies and practices.

THA has reviewed management of its waiting lists for both the housing portfolio that it manages and for its Housing Opportunity Program of rental assistance. It undertook this review to address serious challenges related to those waiting lists. The first challenge was the long time THA took to turn a vacant unit. Part of the problem was the "leasing time "necessary to find the next tenant. In 2017, that leasing time hit an all-time high of 65 days. It took this long even though Tacoma's rental market has become very competitive and the region has a crisis shortage of affordable housing. THA should have no shortage of customers from its waiting lists willing to rent.

The administration of the waiting lists is also complicated, confusing, and burdensome for both applicants and THA. THA closed its Property Waiting Lists 2 years ago. Some applicants have been waiting for more than 8 years for an offer of a housing unit. THA allows applicants to apply to one or more properties when the waiting lists are open. This can be hard on THA to track. Leasing staff usually must contact several names on the list until they hear back from an applicant. Often applicants are not ready to lease a unit. For example, they may be in the middle of a fixed-term lease. Or their eligibility status has changed since they applied several years previously. Just as often THA cannot contact an applicant who may have moved several times in the years since applying.

THA has made earlier efforts to address these challenges, with some notable successes. In 2014 and again in 2016, THA engaged outside consultants. We also convened a working group of THA staff to map the waiting list process to prepare for our new enterprise software system, Open Door. These efforts resulted in several waiting list improvement recommendations. However, THA did not implement all recommendations. The work clearly remained unfinished.

In December 2017 THA's Board of Commissioners approved Resolution 2017-12-13. This consolidated the Property Waiting Lists and the Housing Opportunity Program (HOP) Waiting List into one combined list, sorted by bedroom size. THA exhausted its HOP Waiting List at the time. Instead of opening the separate HOP waiting list and accepting more separate HOP applications the board allowed THA to offer a HOP subsidy to applicants already on the Consolidated Property Waiting List. That helped to simplify administration and to offer a HOP voucher to people who had been waiting years for a unit and would wait years more. That also helped improve THA's voucher utilization rate.

More significantly, Property Management led a thorough review of its unit turn and lease processes. THA now takes less than 20 days, key to key, to turn a vacant unit. Leasing time accounts for only 6 of those days.

Further work is necessary to sustain and improve this progress and to make the wait list management easier for THA staff and for applicants. To do this, THA convened a Waiting List Mapping Team of THA staff. This team had representatives from Asset Management, Property Management, Rental Assistance, and Policy Innovation and Evaluation. THA asked the Team to recommend ways to improve the wait list management. The team reviewed all the previous work, including recommendations from consultants. It assessed the advantages and disadvantages of having waiting lists. It consulted over 50 market rate property managers and landlords, nonprofit subsidized housing providers, and Moving to Work and Non-Moving to Work housing authorities. These consultations included one-on-one interviews, emails, phone calls, electronic surveys and web site research.

This effort produced a report with recommendations. The Board received then current versions of that report during the summer and last month. This resolution conveys the final version of staff recommendations.

The report conveys 13 recommendations. Nine are interim recommendations that THA should implement immediately and are the topic of this resolution. Later, THA should implement four long term recommendations.

The interim and long term recommendations account for the following:

- The needs and conveniences of the property waiting list applicants.
- The capacity and availability of staff. THA's need to turn units under 20 days, preferably fewer days.
- The capacity and limitations of THA's new software, OpenDoor.

- The recommendations on the topic from outside consultants, TCAM and HDC.
- The practices of other high performing PHAs, affordable housing providers and market rate property managers.
- Making THA Portfolio Management more consistent with other THA programs.

#### 1. Summary of Recommendations

This section outlines the recommendations contained within this resolution. THA's duty to offer a reasonable accommodation to disabled persons may allow or require an exception to the recommended policies or procedures.

#### 1.1. Continue to use THA's Waiting Lists for the Portfolio.

Some recommend that THA do without waiting lists for its portfolio. THA would then manage as market rate portfolio's do. They advertise and consider applicants, first come, first served. This report recommends that THA keep a waiting lists, for two reasons. **First**, doing so aligns with THA's mission to serve the neediest in our community. Many of them do not have the means or the savvy to monitor unit availability or to respond to an advertisement quickly enough. A waiting list gives them an equitable chance.

**Second**, the experience of other housers does not show that lease up times reduce without waiting lists. The only advantage we can expect from eliminating waiting lists is a greater ease of administration and some possible cost reduction. Yet THA will get those benefits plus lower lease up times by implementing the recommendation on Pre-Resident Orientation process (7.1.8) and an Online Property Portal (7.2.2) for virtual tours. These will better prepare potential tenants in advance for lease up, address issues or barriers they may have early in the process and decrease the likelihood that they will decline a unit based on property type or location. *See* Section 6 for the Advantages and Disadvantages of Property Waiting Lists.

#### 1.2. Remove separate waiting lists for separate properties.

THA should not have separate waiting lists of its separate properties. Instead, THA will place applicants on one waiting list for the bedroom size they qualify for based on household size. THA will offer applicants the first available unit of that size at any property. If when a household comes to the top of the waiting list two or more units of the appropriate bedroom size are available at different properties, THA will offer the household a choice from among those two or more units.

THA should apply this recommendation to those applicants on the current Consolidated Waiting List as well as new applicants.

# 1.3. Continue consolidated (combined) waiting list for the portfolio and the HOP Program.

THA should continue to have one consolidated waiting list for its managed properties and the HOP Program. A Consolidated Waiting list is easier to manage. It gives applicants a chance to get housing assistance sooner and a choice between a unit and a voucher. It speeds the pace of voucher issuance and in that way helps utilization.

THA would offer an applicant who comes to the top of the waiting list a choice of an apartment or a voucher. If the applicant chooses a HOP voucher but cannot use it, he or she would resume his or her original place on the waiting list for an apartment. THA would not offer them another voucher. If an applicant is offered a unit but declines the unit, the applicant can request a HOP voucher if the applicant has not previously declined the offer of a HOP voucher.

### 1.4. Require applicants to check in quarterly.

In order to further decrease lease up time on THA units, THA should begin requiring waiting list applicants to check in every 3 months. THA should allow them to check in at an office or by telephone. THA is also developing an on-line portal to allow for remote check-ins. THA should begin this requirement only after: (i) it can send them a reminder at appropriate intervals, and (ii) the portal is working and staff have decided it is ready for client use.

This check-in will help ensure that THA always has the current contact information and that the client is still interested in and eligible for the same bedroom size based on household size and income. It is also an opportunity to engage with a potential tenant and measure their interest and preparedness when a suitable unit does become available. THA will remove applicants from the waiting list if they fail to check-in. THA will continue a liberal reinstatement policy to allow applicants to appeal if they have been removed from the waiting list.

### 1.5. Refine the definition of "housed" and remove "housed" households from THA waiting lists.

THA should refine its definition of which applicants on the waiting list are "housed". It should remove "housed" applicants from the waiting list.

Currently, THA keeps a person on its waiting lists even when THA gives them a HOP voucher, or rents him or her, an apartment, including an apartment in a property that they chose. In these cases, THA allows them to remain on the list waiting for other properties that they also choose.

Staff recommends that THA consider as "housed" all persons using a THA subsidy, either through a rental assistance voucher or an apartment or home. THA should consider them ineligible for another type of assistance and remove them from all waiting lists. The only exception that would have THA offer them an alternative type of assistance would be when necessary and reasonable as an accommodation to a disability or through another qualified transfer request.

THA should apply this change to applicants on the current Consolidated Waiting List as well as new applicants.

### 1.6. Change reinstatement policy from 12 months to 6 months.

Every now and then THA writes to applicants on the waiting list to confirm their continued interest in the housing they have applied to get. If a household does not respond THA removes them from all THA waiting lists. Under current policies, removed applicants can ask THA to reinstate them if they contact THA within twelve months of being removed from the list(s). In those cases, THA will reinstate them without any further inquiry. THA should reduce this grace period of 12 months to six (6) months.

This change leaves applicants a reasonable time to request reinstatement. It eases the administrative burden of wait list management. THA should apply this change to current and future applicants on the list.

#### 1.7. Limit and redefine "Good Cause" to decline a Unit.

Presently THA allows applicants to decline an apartment for "good cause." Under the current policy "good cause" includes housing locations that will cause undue hardship related to employment, education, training, health needs, or day care. Presently, "good cause" does not include being in a lease that the applicant cannot get out of without penalty.

The present policy imposes no limit on the number of times an applicant may decline a unit for "good cause". Many applicants turn down a unit that would suit their needs because they know they will have a chance at another unit that they prefer. Applicants also turn down a unit because they are in a lease and would incur penalties if they move.

Tacoma is in a housing crisis with no end in sight. Homelessness is at an all-time high. The City has declared a state of emergency. THA is doing everything within its means to provide affordable, safe and stable housing to as many households as possible.

To account for this, staff recommend revising the "good cause" policy to allow for only one turn down and then only for "good cause". Staff proposes to add as "good cause" being in a lease that the applicant cannot leave without penalty.

Under this recommendation, if an applicant turns down a unit the first time for a "good cause" they can, (1) Wait for another unit and have one more chance to accept it, or (2) request a HOP voucher (even if they declined one previously) or (3) ask to be moved to the bottom of the waiting list. THA would remove an applicant from the waiting who without good cause declines an offered unit or the voucher.

This proposal will apply to those applicants on the current Consolidated Waiting List as well as new applicants.

### 1.8. Refine pre-resident orientations – "Renter Ready"

To help improve lease up time, Property Management began developing a program in January 2018 to assist applicants to prepare to rent. THA is still developing this program. Its basic feature will have THA require an applicant to attend a Pre-Resident Orientation. THA will do this as the applicant approaches the top of the waiting list. The orientation will include the following:

- THA will verify the household's eligibility.
- THA will determine the bedroom size the household is eligible to receive.
- They are shown all available buildings with their approved bedroom size. The applicant can request an in-person tour of the building and / or view the Online Property Virtual Tour when it becomes available.

## 1.9. Adopt the HOP occupancy standards for property waiting list applicants and future THA property residents.

THA uses occupancy standards to determine how many bedrooms a family is eligible to receive in both its portfolio of apartments and in its rental assistance programs. THA uses different occupancy standards for the rental assistance programs versus our portfolio. The rental assistance program assigns two persons per bedroom regardless of age, familial status, and sex. THA's property occupancy standard is more complex. It allows separate bedrooms for adults and children or children of opposite sex. This makes administration and determination of bedroom size confusing for both staff and clients. This is especially the case when we offer rental assistance to a Property Waiting List applicant who may qualify for a bigger bedroom sizes if he or she waited for an apartment. Also, THA's landlord partners who accept our rental assistance object that we impose on them and their tenants a less generous occupancy standard that we apply to ourselves and our own tenants.

Staff recommends that THA adopt the HOP Occupancy Standards for Property Waiting List applicants. This action will also reduce administrative burden and provide consistency by adopting one Occupancy Standard across our portfolio and programs. Perhaps most importantly, this change will allow THA to house more people.

This proposed policy will apply to those applicants on the current Consolidated Waiting List as well as new applicants. It would not apply to current tenants.

#### 2. Consultation

Staff consulted widely about these matters with community members, waiting list applicants, landlords, other housers, both market rated an affordable housers, advocates, and THA staff who do the actual work. The report that the Board has received recounted these efforts and what THA learned from them. The recommendations account for this learning. Here is a summary of those efforts and what THA learned.

### 2.1. Public and Community Consultation

THA posted public meeting notices in buildings, social media, THA's web site and sent out 3,500 postcard invitations. Staff hosted two public meetings. 75 waiting list applicants attended. THA also provided a survey link for public responses to the proposed waiting list changes with 21 responses.

Staff provided participants with a summary of the proposals, a matrix with each proposal and its anticipated impact, and the results of the survey of Moving-to-Work Housing Authorities waiting list practices.

Here is a summary of the responses, concerns and suggestions from the public and community consultation:

#### 2.1.1. Continue to use waiting lists.

Responses were overwhelmingly in favor of THA continuing to use waiting lists for THA owned and managed properties. There were a few inquiries from the public meeting attendees asking if we would consider preferences for veterans, seniors and disabled.

# 2.1.2. Refine the definition of "housed" and remove "housed" households from THA waiting lists.

Most participants were supportive of the proposed change on how we would define being "housed," including removing someone that is already housed by THA from the waiting list. Community partners and waiting list applicants requested that we allow anyone to apply when the list is open and only remove them once they come to the top of the list, if already housed by THA. Pierce County expressed concern that this included people housed through project based vouchers that are ready to exit permanent supportive housing and no longer need services.

The Fair Housing Center said, "There is merit to allowing a family that may already have been assisted to remain on a waitlist for another property they expressed interest in before being placed in their current housing. The other property could be in an area with greater access to opportunity/public accommodations, etc., and applying the lens of equity that is being applied in the umbrella decision to maintain the waitlists, it makes sense to gives these families the opportunity to "upgrade" considering you should be able to turn their old unit around in 20 days and offer that to the next family."

In response to these comments we will allow anyone to apply and only remove them once they come to the top of the list if they are housed by THA at that time.

In response to Piece County, we will engage in a separate conversation about "move on vouchers" for permanent supportive housing tenants. This has been a pending conversation anyway.

In response to the Fair Housing Center, we are recommending to leave the proposal as-is even with these comments because HOP has tenant choice as its basic tenet. We recommend

leaving the portfolio option as is and asking the customer to take their first offer in order to move quickly through the applicants and house people in greatest need of immediate housing.

## 2.1.3. Continue consolidated (combined) waiting list for the portfolio and the HOP program.

Responses were overwhelmingly in favor of THA continuing to use a consolidated waiting list for THA owned and managed properties and offer a HOP subsidy to applicants as appropriate. THA staff members, Continuum of Care members, Service Providers and waiting list applicants like the idea that we offer a voucher to those that are still waiting for a unit and are in desperate need of assistance now, or because they can stay in place if their landlord will accept a voucher.

# 2.1.4. Continue consolidated (combined) waiting list and remove property selection option.

The proposal to remove the property selection option posed concern for a Continuum of Care member and the Fair Housing Center. There was a concern about removing the property selection for families with students in Tacoma Public Schools and allowing families the option to choose between available units when multiple become available at the same time.

We are recommending to leave the proposal as-is even with these comments because with HOP the tenant has choice as its basic tenet. We recommend leaving the portfolio option based on bedroom size as is and asking the customer to take their first offer in order to move quickly through the applicants and house people in greatest need of immediate housing.

#### 2.1.5. Limit and redefine "Good Cause" to decline a unit.

This proposal received the most discussion and comments. NW Justice Project is concerned with limiting one unit turn down for good cause. "What if someone is offered a unit in the same building as the last offer within just a few months – daycare, job, lease issues and could not take it?" While they like that we also offer a HOP subsidy – it is time limited. Continuum of Care members and the Service Provider Network were concerned about school location and special needs for families.

Waiting list applicants wanted to know if they could ask for a voucher if they turned down a unit without a good cause. Applicants were supportive of limiting the reasons for turn downs so people who need housing can move more quickly up the list. They were most concerned about people in need being housed quickly.

All groups agreed that being in a lease that had a financial obligation should be included in "good cause". There were no comments about limiting to zero turn downs for not having a "good cause".

Staff are recommending limiting "good cause" to being a lease that an applicant cannot get out of and offering the applicant the option of being placed at the bottom of the waiting list to give them time to prepare for a unit offer. Staff do not recommend adding in additional reasons

for unit turn downs because applicants will also have the opportunity to accept a HOP voucher that would allow them to lease near a job, school or daycare of their choice.

# 2.1.6. Adopt the HOP occupancy standards for property waiting list applicants and future THA property residents.

For the most part, everyone was support of this proposal however the survey results were split. This may be attributed to the limitation of an online survey without the ability to have a further discussion. NW Justice Project did ask, "How will we handle neighbors complaining if we change OCC Standards for new residents while there are those that are under old policy?"

We will need to consider our messaging as this policy is implemented in order to account for the comments from Northwest Justice Project.

### 2.1.7. Change reinstatement policy from 12 months to 6 months

Most were in favor of this proposal other than those that had concerns about seniors and disabled applicants having access. Commenters were not aware of the specifics of our reasonable accommodations policy that includes provisions for these concerns. Some commenters were glad to hear that we have a reinstatement policy, as some housing authorities do not. The survey results were split almost evenly.

#### 2.1.8. Refine pre-resident orientations — "Renter Ready"

The proposal for "Renter Ready" classes or orientations was well received. There were suggestions on how to make this successful including having providers on site at the classes. The waiting list applicants especially appreciated this proposal and asked about additional services to assist them with leasing up and moving.

### 2.1.9. Applicants must check in quarterly using an online portal

The proposal for an online portal was well received. Everyone liked the idea of THA providing a way to check their waiting list status, update their information and see tips on how to prepare to be a renter. Many asked about methods for access for those less technology savvy or needing assistance. NW Justice Project inquired about email reminders and verification method when the applicant has submitted changes. They asked if we would consider waiving the check-in requirement for seniors and disabled, such as a mirror policy to DSHS's supplemental accommodations. THA Rental Assistance staff members said they would appreciate a portal and we may need to consider a longer check-in time frame, such as semi-annual, if too many folks are missing the quarterly requirement. Members of the provider network felt it was important to place the responsibility on the applicant but also appreciated email reminders. Waiting list applicants asked if we send a letter when they are being removed from the waiting list. They liked the idea of reminders and that they can access a portal from their phone. They said they would appreciate a way to know what number / date we are working on to get a sense of when they are coming to the top of the list. The survey results slightly favored not removing folks from the waiting list if they don't check in quarterly.

#### 2.2. Staff Views

Staff members from Property Management, Rental Assistance, and Policy, Innovation and Evaluation were reconvened to evaluate the responses to each proposal after the community consultation. Each response was considered before staff made a decision on the proposed waiting list change.

All proposed changes to the waiting list were kept in the recommendations. Some of the proposed changes were adjusted based on community feedback. Some of the recommendations will require follow up with community partners if the Board adopts all the proposed changes. The three recommendations that were changed based on public comment include:

2.2.1. Refine the definition of "housed" and remove "housed" households from THA waiting lists.

This recommendation was adjusted to allow anyone to apply to the waiting list when it is open and only removed when their name comes to the top if they are already considered housed by THA. We acknowledged the concerns expressed by Pierce County for those in Permanent Supportive Housing. The Deputy Executive Director will follow up to discuss Move-On voucher opportunities. The Director of Rental Assistance will follow up with the Fair Housing Center about exit vouchers.

This proposal is to clarify our policy on when someone is considered "housed." Currently, when someone is housed by THA, either with a HOP subsidy or at one our properties, including residents housed at a building of their preference, they stay on the property waiting list because they signed up for more than one property.

The report proposes that all clients and residents housed using a THA subsidy, either through a voucher, a unit, or THA project based, will be changed to a status as "housed" and not offered other THA housing assistance. Households that are currently "housed" with any THA assistance can still apply to the waiting list when it is open but they will be removed from the waiting list when they come to the top if they are currently "housed" by THA. They will not be offered other housing from a THA waiting list or offered the option to move to another property unless it is through a reasonable accommodation request.

This proposal will apply to those applicants on the current Consolidated Waiting List as well as new applicants.

2.2.2. Continue consolidated (combined) waiting list for the portfolio and the HOP Program.

Clarification was added that if a waiting list applicant has previously declined a HOP voucher offer and also declines a unit for no good cause, they will not have another opportunity for a voucher offer.

THA should continue to have one consolidated waiting list for its managed properties and the HOP Program. A Consolidated Waiting list is easier to manage. It gives applicants a chance

to get housing assistance sooner. It speeds the pace of voucher issuance and in that way helps utilization.

THA would offer an applicant who comes to the top of the waiting list a choice of an apartment or a voucher. If the applicant chooses a HOP voucher but cannot use it, he or she would resume his or her place on the waiting list. If an applicant is offered a unit but declines the unit, the applicant can request a HOP voucher if the applicant has not previously declined the offer of a HOP voucher.

#### 2.2.3. Limit and redefine "Good Cause" to decline a unit.

Based on community and applicant feedback we are adding additional choices when it is the first "good cause" turn down. We acknowledge the concerns from community partners and one of our Board members about families with school age children and their desire to stay in their school catchment area. THA units help serve those with most urgent need, while a voucher give more choice and those wanting other opportunities.

Current policies allow applicants to have unlimited opportunities to turn down for "good cause." Staff members find that many applicants turn down a unit that would suit their needs because they know they will have a chance at another unit. They also find that applicants turn down a unit because they are in a lease and would be penalized if they move, but this is not currently considered a "good cause".

Tacoma is in a housing crisis with no end in sight. Homelessness is at an all-time high and the City has declared a state of emergency. THA is doing everything within its means to provide affordable, safe and stable housing to as many households as possible. We recommend revising the "good cause" policy to allow for one "good cause" turn down and no addition turn down opportunities if it is not considered a "good cause".

Being in a lease with a financial obligation will now be considered a "good cause" to turn down the offer of a unit, including non-disabled / elderly households. If an applicant turns down a unit the first time for a "good cause" they can, (1) wait for another unit, or (2) request a HOP voucher (even if they declined one previously) or (3) ask to be moved to the bottom of the waiting list. A client's need for reasonable accommodation will not count as a unit turn down.

This proposal will apply to those applicants on the current Consolidated Waiting List as well as new applicants.

#### Recommendation

Approve Resolution 2018-10-24 (3) to adopt revisions to THA's Administrative Plan and Admissions and Continued Occupancy policy. The full list of policy changes necessary to implement the recommendations outlined in this cover memo are included in the resolution itself.



#### **RESOLUTION 2018-10-24 (3)**

(Proposed Revisions to Tacoma Housing Authority's Administrative Plan and Continued Occupancy Plan re: Waiting List Management)

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

WHEREAS, The Administrative Plan relates to the administration of the Housing Choice Voucher program and is required by HUD; and

WHEREAS, The Admissions and Continued Occupancy Plan (ACOP) relates to the administration of the Public Housing program and is required by HUD; and

WHEREAS, The Administrative Plan and ACOP establish policies for carrying out programs in a manner consistent with HUD requirements and local goals and objectives contained in THA's Moving to Work plan; and

WHEREAS, Changes to the Administrative Plan and ACOP must be approved by THA Board of Commissioners; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City Of Tacoma, Washington, that:

Staff is authorized to adopt the following updates to the Administrative Plan to reflect the proposed policy changes.

Policy / Process Proposal	Applicable THA Policy Requiring Revision
Continue to use THA's property waiting lists	No changes to Administrative Plan or ACOP
Remove property selection option	No changes to Administrative Plan or ACOP
Continue consolidated (combined) waiting list for the portfolio and the HOP Program	No changes to Administrative Plan or ACOP
Require applicants to check in quarterly (This requirement will begin when THA can send them reminders at appropriate intervals and	Admin Plan 4-II.F. "Updating the Waiting List"  "Remove from Waiting List"

when the online portal is active and staff have decided it is ready for client use)	Remove if household fails to check in once a quarter according to the calendar year.
	ACOP
	4-II.F. "Updating the Waiting List"
	"Purging the Waiting List"
	Remove if household fails to check in once a quarter according to the calendar year.
Refine the definition of "housed" and remove THA "housed" households from THA waiting list when their name comes to the top.	Admin Plan
	4.II.F. "Removal from the Waiting List"
	Remove if already housed by THA through a housing subsidy or in a unit subsidized by THA at the time they are eligible for an offer (even if housed in a property they did not originally apply for).
	ACOP
	4.II.F. "Removal from the Waiting List"
	Remove if already housed by THA through a housing subsidy or in a unit subsidized by THA at the time they are eligible for an offer (even if housed in a property they did not originally apply for).
	5-II.A. "Overview"
	PHA will offer the first available unit(s) based on eligible bedroom size only if the household is not already housed by THA in a unit or through a housing subsidy.
Limit and redefine "Good Cause" to decline a unit	ACOP
	5-II.A. "Overview"
	PHA will offer the first available unit based on eligible bedroom size.
	5-II.B. "Number of Offers"
	PHA will remove an applicant from the wait list who without good cause declines an offer or a unit or the voucher. If the applicant declines the first offered unit offer for "good cause", they can stay on the waiting list, request a voucher (if one has not already been

offered and declined) or they can request to be moved to the bottom of the waiting list.
5-II.D. "Refusal of Unit Offers"
"Good Cause for Unit Refusal"
Include an example of being in a fixed term lease that the applicant cannot escape without penalty. This good cause and all others related to employment, training, education and daycare will also extend to non-elderly and non-disabled households. (Clarification)
5-II.D. "Refusal of Unit Offers"
"Unit Refusal Without a Good Cause"
When an applicant rejects the one and only unit offer without a good cause, the PHA will remove the applicant name from the waiting list and send notice to the family of such removal.
ACOP
5-I.B. "Determining Unit Size"
Adopt HOP standards from 18-X.A. of the Admin Plan for eligible bedroom size.
Admin Plan
4-II.F. "Updating the Waiting List"
Request in writing to be placed back on the waiting list within 6 months
ACOP 4-II.F. "Updating the Waiting List"
"Purging the Waiting List"
Request in writing to be placed back on the waiting list within 6 months
No changes to Administrative Plan or ACOP

Note: Additional minor revisions to the Administrative Plan and ACOP may be necessary to provide clarity.

Approved: October 24, 2018

Dr. Minh-Anh Hodge, Chair