



District of Columbia Housing Authority

Summary of Substantial Updates to the Admission and Continued Occupancy Plan, the Administrative Plan and the 2023 Moving To Work Annual Plan

Background

In September 2022, the US Department of Housing and Urban Development delivered to the DC Housing Authority (DCHA) a report of findings from their March 2022 assessment of the Agency. Nearly a third of the findings require the Agency to make updates to the Administrative Plan or Admissions & Continued Occupancy Plan (ACOP). Throughout the month of January, DCHA updated these Plans using it as an opportunity to:

- Align with HUD regulations;
- Incorporate the best practices from the industry and other public housing authorities; and
- State policies in plain language, so they are clear to all stakeholders.

Informed by the revisions to the ACOP and Administrative Plan, DCHA is also drafting a substantial revision to its Moving to Work (MTW) plan. Local law requires that the agency publish its policies as regulations, which DCHA will do in February 2023.

DCHA's Four Governing Documents

MTW Annual Plan	Admissions & Continued Occupancy Plan (ACOP)	Administrative Plan	Title 14 of the DCMR
<ul style="list-style-type: none">• Outlines operating plans• Requests & provides updates regarding MTW flexibilities	<ul style="list-style-type: none">• Outlines Public Housing policies	<ul style="list-style-type: none">• Outlines Voucher Program policies	<ul style="list-style-type: none">• Codifies ACOP and Admin Plan policies into local regulations

Reviewing the Plans and Providing Feedback

The ACOP, Administrative Plan and revisions to the MTW plans are posted on DCHA's website: <https://www.dchousing.org/wordpress/about-us/moving-to-work/>. Written comments regarding the MTW Plan will be accepted through Thursday, March 16, 2023. Written comments regarding the ACOP and Administrative Plan will be accepted through Friday, March 31, 2023. Written comments will be accepted via email at MTW@dchousing.org. Alternatively, you can mail comments to: Hanna Koerner c/o DCHA; 1133 North Capitol Street, N.E., Suite 200; Washington, D.C. 20002.

DCHA will host a Public Hearing online on Monday, March 6, 2023 at 6 p.m. To participate in the hearing, please join on DCHA's Facebook page at <https://www.facebook.com/dchousing>.



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Overview of Updates

Waiting List – How do I get on the list for assistance?

Preferences (HCV & Public Housing)

Current Policy: The agency maintains one waiting list, and when the waiting list is open, people have the option to select up to three categories: Public Housing, Housing Choice Voucher Program (HCVP) and Moderate Rehabilitation. There are preferences for each waiting list. For Public Housing, they are: (1) working family and (2) emergency. For HCVP and Moderate Rehabilitation, they are: (1) homeless, (2) sub-standard housing, (2) involuntarily displaced, and (4) rent burdened.

New Policy: The agency will eliminate all preferences. For HCVP, applicants will be selected based on the date and time of their application. For Public Housing, the agency will move to site-based lottery-system waiting lists (see below.)

Rationale: DCHA's eligibility and match process is inefficient; eliminating the preferences will reduce the length of time it takes for people to get housed. Additionally, since the establishment of the homeless preference, the District has made substantial investments in housing solutions for people experiencing homelessness. Removing the homeless preference ensures that low-income residents can access housing assistance outside of the homeless services system.

Site-Based Waiting Lists (Public Housing)

Current Policy: The agency maintains one waiting list for all public housing sites.

New Policy: After everyone on the waiting list - who has selected the public housing category - has had the opportunity to apply for housing, DCHA will operationalize site-based lottery-system waiting lists. Applicants will select sites based on their personal preferences (e.g., location) and family size (e.g., some buildings only have one-bedrooms).

Rationale: Because applicants will share their neighborhood preferences in advance, our eligibility and match process will be more efficient, reducing the length of time it takes us to fill public housing units. We see a significant amount of attrition after people get through the eligibility process because they do not want to live in places where units are available at that time. By moving to a lottery system, all applicants who apply during a specified time will have equal opportunity to receive housing.

Waiting List Maintenance (HCV & Public Housing)

Current Policy: Applicants on the DCHA waiting list who do not respond to the Agency's outreach to update their information and/or to complete eligibility remain on the Agency's waiting list but move to an inactive status. If they complete an update form at any time after, they are restored to active status with their original date and time per Resolution 11-07.



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New Policy: Applicants on the DCHA waiting list who do not respond to the Agency's outreach to confirm interest or update their information within 15 business days (approximately 21 calendar days) will be removed from the waiting list. Outreach will be done by mail and by email.

Rationale: HUD requires DCHA to maintain the waitlist; they clarified in our December 2022 meeting that it is the responsibility of the applicant to inform DCHA of changes to their family composition and/or contact information. Moving forward and with safeguards and appeals processes in place, DCHA will remove households from the list if they do not respond to our outreach, so that we can house others who need assistance timely. This will make our eligibility and match process more efficient reducing the length of time it takes us to fill units.

Initial Lease Up – How do I get into a unit?

Rent Reasonableness (HCV only)

Current Policy: Using our Moving to Work (MTW) authority, DCHA proposed, several years ago, an alternative method for assessing payment standards and rent reasonableness, which relies on setting "approved rents" by neighborhood submarket across the District. When landlords present rental contracts to DCHA, the rent must be no more than the approved rent and landlords are required to confirm that the rent is comparable to other similar market rate units.

New Policy: DCHA will do an annual market analysis and set payment standards accordingly. The agency will also begin conducting rent-reasonableness determinations on a unit-by-unit basis to compare rents to similar unassisted units using a third-party database.

Rationale: This change is responsive to HUD's expectations and provides additional assurance that the agency's resources are allocated appropriately.

Initial Voucher Term (HCV only)

Current Policy: The initial term – or time families have to identify a unit – is 180 days.

New Policy: The initial term – or time families have to identify a unit – will be reduced to 120 days. A 60-day extension will be granted upon written request.

Rationale: This will ensure agency resources are allocated to families with active leases – and incentivize families to actively search for their new home.

Minimum Rent (Public Housing only)

Current Policy: There is no minimum rent for residents.

New Policy: The minimum rent will be increased to \$50 per month.



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Rationale: This nominal rent will be charged to encourage self-sufficiency and increase resident's investment in their community. A minimum rent is required by HUD and is consistent with practices at other Public Housing Authorities.

Choice of Income-Based or Flat Rent (Public Housing only)

Current Policy: Under previous MTW authority, DCHA automatically calculated both rent options and charged residents the most advantageous rent for the resident.

New Policy: Public Housing residents will have a choice of income-based or flat rent. Flat rents will be set at 80% of FMR.

Rationale: In acknowledgement of HUD's decision that the MTW Standard Agreement does not provide the authorization for this flexibility, DCHA will offer the choice at initial lease-up and each recertification.

Continued Participation – How do I keep my assistance?

Pet (Public Housing only)

Current Policy: Elderly-only and mixed population properties are allowed to have pets.

New Policy: Effective January 2024, DCHA will only allow non-service or assistance animals in elderly/disabled buildings. Residents who have maintained pets prior to January 2024 will be allowed to keep their pet as long as the animal has been registered with DCHA and by a licensed veterinarian or state/local authority. Owners must adhere to cleanliness, noise, and pet care standards. Pet leases and fees will be enforced. The registration must be renewed annually, and the resident must pay a pet deposit. Additionally, the pet must meet the requirements in the updated House Rules. **Service animals and support animals are exempt from this policy.**

Rationale: This allows current pet owners to keep their pets within reason as outlined in the ACOP. The pet owners will be required to register, pay the deposit and enter into a pet agreement with DCHA.

Over Income (Public Housing only)

Current Policy: A family may be over-income for 24 months before they are terminated from the program.

New Policy: Residents that are over-income (120% of AMI) for more than 24 months will be charged the higher of FMR or the amount of monthly subsidy for the unit once alternative rent requirements for over-income families become legally effective. Until then, DCHA will continue offering the choice of income-based or flat rent.

Rationale: DCHA is aligning its programs and policies with HUD regulations and opting not to terminate residents.



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Community Service and/or Economic Self-Sufficiency (Public Housing only)

Current Policy: Residents will be required to perform 8 hours of Community Service and/or economic self-sufficiency per month unless exempt.

New Policy: This is not a change in policy; this is a change in practice.

Rationale: DCHA is aligning its programs and policies with HUD regulations.

Repayments (Public Housing only)

Current Policy: Public Housing does not have a specific policy for a debt owed.

New Policy: If a debt is owed by a family; the family has the option to enter into a repayment agreement with DCHA.

Rationale: Allows DCHA and the family to mutually enter into an agreement within 30 days of notice for repayment without the court proceedings. If the family fails to meet the agreement obligations, DCHA will move forward with eviction proceedings.

Termination – When would I lose my assistance?

Zero HAP Timelines (HCV only)

Current Policy: DCHA terminates a participant's HAP after one year of zero HAP assistance.

New Policy: DCHA will terminate a HAP after 180 days of zero HAP assistance.

Rationale: DCHA does not have the authority to implement the current policy and is aligning the policy with HUD regulations.

Threats to/Abuse of Staff (Public Housing only)

Current Policy: No policy

New Policy: Threatening and/or abusive language towards staff are grounds for termination.

Rationale: This is currently in our lease agreement, but we are embedding in policy to be consistent with what is in the lease. Resident and staff safety are imperative to a healthy community.